# SOUTHERN DISTRICT OF NEW YORK In re: Chapter 11

UNITED STATES BANKRUPTCY COURT

PURDUE PHARMA L.P., et al.,

Debtors.<sup>1</sup> : (Jointly Administered)

THIRD JOINT INTERIM FEE APPLICATION OF KPMG LLP
AS TAX CONSULTANT TO THE DEBTORS AND THE OFFICIAL COMMITTEE
OF UNSECURED CREDITORS FOR ALLOWANCE OF COMPENSATION FOR
SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES
FOR THE PERIOD FROM JUNE 1, 2020 THROUGH SEPTEMBER 30, 2020

Case No. 19-23649 (RDD)

Name of Applicant:	KPMG LLP
Authorized to Provide Professional Services to:	Debtors and the Official Committee of Unsecured Creditors
Date of Retention:	February 24, 2020 <i>Nunc Pro Tunc</i> to December 23, 2019
Period for which Compensation and Expense Reimbursement is sought:	June 1, 2020 through September 30, 2020
Amount of Compensation sought as actual, reasonable and necessary:	\$ 650,638.50
Amount of Expense reimbursement sought as actual, reasonable and necessary:	\$ 0.00
This is aMonthlyXInterim	_ Final Application
The Application does not request compensation at this time for this Third Interim Fee Application. The Applicant intends to see the compensation of the Applicant intends to see the compensation of the Applicant intends to see the compensation at this time for the Applicant intends to see the compensation at this time for the Applicant intends to see the compensation at this time for the Applicant intends to see the compensation at this time for the Applicant intends to see the compensation at this time for the Applicant intends to see the compensation at this time for the Applicant intends to see the compensation at th	

The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

### **Prior Interim Applications Filed:**

	Monthly Fee Application Totals:		Total Monthly Am	Total Holdback	
Period Covered:	Fees (@100%)	Expenses (@100%)	Fees (@80%)	Expenses (@100%)	Fees Requested: (@20%)
12/23/2019-1/31/2020					
Docket # 893 Filed: 3/3/2020	\$580,539.30	\$614.93	\$465,046.37	\$614.93	\$116,107.86
(First Interim)					
Less agreed upon reduction with Fee Examiner related to KPMG's 1st Interim:					(\$15,000.00)
Total Holdback Fees Requested:				\$101,107.86	

		Application's tals:	Total Monthly Amounts Requested:		Total Holdback	
Period Covered:	Fees (@100%)	Expenses (@100%)	Fees (@80%)	Expenses (@100%)	fees Requested: (@20%)	
2/1/2019-5/31/2020						
Docket # 1396 / Filed: 7/15/2020	\$2,000,637.75	\$592.22	\$1,600,510.20	\$592.22	\$400,127.55	
(Second Interim)						
Subtotals:	\$2,000,637.75	\$592.22	\$1,600,510.20	\$592.22	\$400,127.55	
Less agreed upon reduction with Fee Examiner related to KPMG's 2nd Interim:				(30,000.00)		
TOTAL Holdback Fees Requested:				\$370,127.55		

### **Prior Monthly Fee Applications Filed:**

Period Covered:	Monthly Fee Application Totals: Total Monthly Amount Requested:		Total Holdback Fees		
r criod covered.	Fees (@100%)	Expenses (@100%)	Fees (@80%)	Expenses (@100%)	Requested: (@20%)
6/1/2020 – 6/30/2020 Docket # 1548 Filed: 8/5/2020 (Sixth Monthly)	\$204,044.40	\$0.00	\$163,235.52	\$0.00	\$40,808.88
7/1/2020 – 7/31/2020 Docket # 1655 Filed: 9/3/2020 (Seventh Monthly)	\$234,078.90	\$0.00	\$187,263.12	\$0.00	\$46,815.78
8/1/2020 – 8/31/2020 Docket # 1774 Filed: 10/2/2020 (Eighth Monthly)	\$161,831.30	\$0.00	\$129,465.04	\$0.00	\$32,366.26
9/1/2020 – 9/30/2020 Docket # 1819 Filed: 10/18/2020 (Ninth Monthly)	\$50,683.90	\$0.00	\$000,000.00	\$0.00	\$10,136.78
Totals:	\$650,638.50	\$0.00	\$520,510.80	\$0.00	\$130,127.70

### **ATTACHMENT A TO FEE APPLICATION**

Professional Person	Position & Department	Total Hours Billed	ourly ng Rate	Co	Total ompensation
Alan Zhao	Senior Manager - Tax	2.2	\$ 695	\$	1,529.00
Alejandro Merelles Rodriguez	Senior Associate - Tax	6.8	\$ 640	\$	4,352.00
Anthony Minervini	Managing Director - Washington National Tax	21.3	\$ 893	\$	19,020.90
Aroen Rambhadjan	Partner - Tax	4.6	\$ 884	\$	4,066.40
Arpit Desai	Senior Manager - Tax	0.8	\$ 750	\$	600.00
Ashley Armfield	Senior Associate - M&A Tax	100.5	\$ 534	\$	53,667.00
Becky Holtje	Senior Manager - Washington National Tax	59.4	\$ 744	\$	44,193.60
Bela Unell	Senior Manager - Washington National Tax	9.4	\$ 744	\$	6,993.60
Carol Conjura	Partner - Washington National Tax	0.5	\$ 906	\$	453.00
Casey Nunez	Senior Manager - M&A Tax	59.4	\$ 744	\$	44,193.60
Curt Wilson	Senior Manager - Washington National Tax	8.1	\$ 744	\$	6,026.40
Danielle Moloughney	Associate - Tax	1.5	\$ 172	\$	258.00
Devon Rowles	Associate - M&A Tax	72.1	\$ 350	\$	25,235.00
Diego Lipp	Senior Associate - Tax	0.6	\$ 430	\$	258.00
Douglas Holland	Principal - Washington National Tax	10.9	\$ 985	\$	10,736.50
Emilien Lebas	Partner - Tax	3.0	\$ 985	\$	2,955.00
Frankie Angeleri	Associate - Economic & Valuation Services	107.0	\$ 520	\$	55,640.00
Fred van Horzen	Partner - Tax	0.2	\$ 884	\$	176.80
Gabriela Baker	Senior Associate - International Tax	17.6	\$ 534	\$	9,398.40
Gavin Little	Managing Director - Tax	0.7	\$ 985	\$	689.50
Gregory Bell	Partner - Tax	3.0	\$ 743	\$	2,229.00
Howard Steinberg	Partner - M&A Tax	19.1	\$ 856	\$	16,349.60
Isaac Hirsch	Managing Director - Int'l Tax	159.7	\$ 819	\$	130,794.30
Jess Commisso	Associate - M&A Tax	117.8	\$ 350	\$	41,230.00
Jim Tod	Partner - Washington National Tax	5.8	\$ 906	\$	5,254.80
Jonas Lau	Senior Manager - Tax	6.3	\$ 614	\$	3,868.20
Kieran Taylor	Senior Manager - Tax	25.4	\$ 744	\$	18,897.60
Larry Mack	Senior Manager - Washington National Tax	1.0	\$ 744	\$	744.00
Lukas van der Veen	Manager - Tax	13.1	\$ 565	\$	7,401.50
Madeleine Latham	Associate - Tax	0.9	\$ 343	\$	308.70
Mark Hoffenberg	Principal - Washington National Tax	4.9	\$ 980	\$	4,802.00
Molly Minnear	Principal - Economic & Valuation Services	7.2	\$ 868	\$	6,249.60
Monica Plangman	Associate Director - Bankruptcy	12.7	\$ 264	\$	3,352.80

### **ATTACHMENT A TO FEE APPLICATION, continued**

Professional Person	Position & Department	Total Hours Billed	urly g Rate	Co	Total mpensation
Paul Harden	Managing Director - Tax	3.4	\$ 985	\$	3,349.00
Pete DiMatteo	Manager - Int'l Tax	86.9	\$ 650	\$	56,485.00
Ray Bosques	Associate - M&A Tax	0.8	\$ 350	\$	280.00
Rob Keller	Managing Director - Washington National Tax	16.0	\$ 893	\$	14,288.00
Robin Lijzenga	Manager - Tax	4.5	\$ 730	\$	3,285.00
Sam Tyler	Partner - Tax	2.3	\$ 743	\$	1,708.90
Sara Gonzalez Perez	Associate - Tax	7.0	\$ 380	\$	2,660.00
Teresa Williams	Associate - Bankruptcy	9.4	\$ 140	\$	1,316.00
Tracy Stone	Principal - Washington National Tax	26.3	\$ 906	\$	23,827.80
Wendy Shaffer	Manager - Bankruptcy	57.0	\$ 202	\$	11,514.00
Hours and Fees and Discounted	l Rates	1,077.1		\$	650,638.50
Net Requested Fees				\$	650,638.50
Out of Pocket Expenses				\$	-
Net Requested Fees & Out of P	ocket Expenses			\$	650,638.50
Blended Rate		\$ 604.07			

### **COMPENSATION BY PROJECT CATEGORY**

Project Category	Total Hours Billed	Total	l Fees Requested
Bankruptcy Tax Consulting Services	995.6	\$	632,602.60
Non -Working Travel Time	0.0	\$	-
Retention Services	0.0	\$	-
Fee Application Preparation Services	81.5	\$	18,035.90
	1,077.1	\$	650,638,50

### **EXPENSE SUMMARY**

Service Description	Amount
Airfare	-
Lodging	\$ -
Meals	\$ -
Ground Transportation	\$ -
Total	-

### UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

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In re:	:	Chapter 11

PURDUE PHARMA L.P., et al., : Case No. 19-23649 (RDD)

Debtors. : (Jointly Administered)

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INDEX OF THIRD JOINT INTERIM FEE APPLICATION OF KPMG LLP AS TAX CONSULTANT TO THE DEBTORS AND THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM JUNE 1, 2020 THROUGH SEPTEMBER 30, 2020

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SCHEDULE 1	Copy of KPMG Sixth Monthly Fee Application
SCHEDULE 2	Copy of KPMG Seventh Monthly Fee Application
SCHEDULE 3	Copy of KPMG Eighth Monthly Fee Application
SCHEDULE 4	Copy of KPMG Ninth Monthly Fee Application
SCHEDULE 5	Copy of Retention Order
SCHEDULE 6	Certification of Professional

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### UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

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In re:	:	Chapter 11

PURDUE PHARMA L.P., et al., : Case No. 19-23649 (RDD)

Debtors. : (Jointly Administered)

THIRD JOINT INTERIM FEE APPLICATION OF KPMG LLP
AS TAX CONSULTANT TO THE DEBTORS AND THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS FOR ALLOWANCE OF COMPENSATION FOR
SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES
FOR THE PERIOD FROM JUNE 1, 2020 THROUGH SEPTEMBER 30, 2020

KPMG LLP, ("KPMG"), as Tax Consultant to the above captioned Debtors and Debtors-inpossession (the "Debtors") and the Official Committee of Unsecured Creditors (the "Committee")
files this Third Joint Interim Fee Application (the "Joint Application") for Allowance of
Compensation for Services Rendered and Reimbursement of Expenses pursuant to sections 328(a)
and 1103 (a) of title 11 of the United States Code (the "Bankruptcy Code"), Rule 2014(a) of the
Federal Rules of Bankruptcy Procedure and Rules 2014-1 and 2016-1 of the Local Rules of
Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the Southern District
of New York (the "Local Rules"), the General Order M-412 (Order Establishing Procedures for
Monthly Compensation and Reimbursement of Expenses of Professionals, dated December 21,
2010), Administrative Order M-447 (Amended Guidelines for Fees and Disbursements for
Professionals in Southern District of New York Bankruptcy Cases, dated January 29, 2013, the
United States Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement
of Expenses Filed Under 11 U.S.C. Section 330 issued by the Executive Office of the United States
Trustee's Guidelines (the "Guidelines"), and this Court's Order Establishing Procedures for Interim
Compensation and Reimbursement of Expenses for Retained Professionals dated November 21,

2019 (the "Interim Compensation Order") [Docket No. 529]. By this Third Joint Interim Application, KPMG seeks the allowance of compensation for professional services performed and actual and necessary expenses incurred by KPMG for the period from June 1, 2020 through September 30, 2020 (the "Compensation Period"), in the amount of \$650,638.50 (the "Compensation Amount"), and respectfully represents:

#### **Background**

- 1. On September 15, 2019 and September 16, 2019, the (the "Petition Dates"), each of the Debtors filed a voluntary petition for relief under chapter 11 of title 11 of the Bankruptcy Code. The Debtors are authorized to continue to operate their business and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. On September 18, 2019, the Court entered an order directing the joint administration and procedural consolidation of the chapter 11 cases pursuant to Bankruptcy Rule 1015(b) [Docket No. 59].
- 2. On September 26, 2019, the Office of the United States Trustee (the "<u>US Trustee</u>") appointed the Committee pursuant to section 1102(a)(1) of the Bankruptcy Code [Docket No. 131]. No request for the appointment of a trustee or fee examiner has been made in these chapter 11 cases.

### **Jurisdiction and Venue**

- 3. The United States Bankruptcy Court for the Southern District of New York (the "Court") has jurisdiction over this matter under 28 U.S.C. §§ 157 and 1334. Venue in this Court is proper under 28 U.S.C. §§ 1408 and 1409.
- 4. The bases for the relief requested herein are section 330, and 331 and 1103 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the "Bankruptcy Code"), Bankruptcy Rules 2014 and 2016, and Rules 2014-1 and 2016-1 of the Local Rules for the Southern District of New York (the "Local Rules").

#### **Relief Requested**

5. By this Court's Order, dated February 24, 2020, (the "Retention Order"), [Docket No. 867] the Debtors and the Committee were authorized to retain KPMG as tax consultants *nunc pro tunc* to December 23, 2019. The Retention Order authorized the Debtors and the Committee to compensate KPMG in accordance with the procedures set forth in section 330 and 331 of the Bankruptcy Code, the Bankruptcy Rules, the Local Bankruptcy Rules, the Retention Order and any order of this Court establishing procedures for compensation and reimbursement of expenses for retained professionals.

#### **Summary of Joint Application**

6. During the Compensation Period, KPMG performed the services for which it is seeking compensation on behalf of or for the Debtors and the Committee. By this Joint Application, KPMG requests interim allowance of and approval of compensation of professional fees totaling \$650,638.50 and reimbursement of necessary and actual out-of-pocket expenses in the amount of \$0.00.

#### **Summary of Services During the Compensation Period**

- 7. This Joint Application is KPMG's third interim application for compensation and expense reimbursement filed in these chapter 11 cases as referenced in Attachment A. During the Compensation Period, KPMG provided professional services to the Debtors and the Committee in their efforts to navigate their business through the chapter 11 process.
- 8. Set forth below is a summary of the significant professional services that KPMG rendered to the Debtors and the Committee during the Compensation Period:

#### **Tax Consulting Services**

a. Tax analysis and proposal of structuring alternatives with respect to any disposition of the assets of the Debtors, their affiliates, and any IACs pursuant to any plan proposed in the Chapter 11 Cases;

- b. Quantitative analysis, including preparation and/or review of cash tax models, regarding the projection of cash taxes arising from operations, dispositions, reorganization, and repatriation of funds held by the Debtors and IACs;
- c. Sensitivity analysis of cash tax modeling to determine the potential impact of information that is not available;
- d. Diligence regarding the historical tax positions and tax attributes of the Debtors and the IACs;
- e. Analysis of the tax implications of any payments made by the Debtors to settle claims;
- f. Analysis and proposal of structuring alternatives with respect to the post-emergence tax structure of the Debtors and IACs.

### **Fee Application Preparation Services**

- a. The billing procedures required by the Local Rules and the Interim Compensation Order entered in these cases is different from KPMG's normal billing procedures and as such, have required additional effort to inform the timekeepers of their responsibilities, compile detailed time entries, prepare detailed and summary schedules of fees incurred, and draft the narrative and schedules included in monthly and interim applications.
- 9. During the Compensation Period, KPMG billed the Debtors and the Committee for time expended by professionals based on hourly rates ranging from \$140 to \$985 per hour. The rates reflected in this Joint Application represent a discount of up to 38% from KPMG's standard rates. Of the aggregate time expended, 87.8 hours were expended by partners and principals, 213.8 hours were expended by managing directors and associate directors, 333.5 hours were expended by senior managers and managers, and 442.0 were expended by senior associates and associates. KPMG's blended hourly rate provided during the Compensation Period is \$604.07.
- 10. Section 331 of the Bankruptcy Code provides for interim compensation of professionals and incorporates the substantive standards of section 330 to govern the Court's award of such compensation. 11 U.S.C. § 331. Section 330 provides that a court may award a professional employed under section 327 of the Bankruptcy Code "reasonable compensation for actual, necessary

services rendered . . . and reimbursement for actual, necessary expenses." Id. § 330(a)(1). Section 330 also sets forth the criteria for the award of such compensation and reimbursement:

In determining the amount of reasonable compensation to be awarded...the court shall consider the nature, the extent, and the value of such services, taking into account all relevant factors, including –

- (A) the time spent on such services;
- (B) the rates charged for such services;
- (C) whether the services were necessary to the administration of, or beneficial at the time at which the
- (D) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed;
- (E) with respect to a professional person whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and
- (F) whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

#### 11 U.S.C. § 330(a)(3).

- 11. In addition to Attachment A, a copy of KPMG's sixth, seventh, eighth and ninth monthly fee application filed with the Court is annexed hereto as Schedules, 1, 2, 3 and 4, respectively. KPMG maintains contemporaneous records of the time expended for the professional services and expenses related hereto performed in connection with these chapter 11 cases and such records are maintained in the ordinary course of business.
- 12. KPMG charges its fees in these cases in accordance with the terms set forth in the retention application and the corresponding Steinberg declaration. The fees applied for herein are based on the usual and customary fees KPMG charges to tax clients and are commensurate with the usual and customary rates charged for services performed.

- 13. KPMG respectfully submits that the amounts applied for herein for professional services rendered on behalf of the Debtors and the Committee in these cases to date are fair and reasonable given: (a) the time expended; (b) the nature and extent of the services performed at the time at which such services were rendered; (c) the value of such services; and (d) the costs of comparable services other than in these chapter 11 cases.
- 14. The time and labor expended by KPMG during the Compensation Period has been commensurate with the size and complexity of these cases. In rendering these services, KPMG has made every effort to maximize the benefit to the Debtors' and the Committee to work efficiently with the other professionals employed in these cases, and to leverage staff appropriately in order to minimize duplication of effort.
- 15. Except as provided in section 504(b) of the Bankruptcy Code, KPMG has not shared, or agreed to share, any compensation received as a result of these cases with any person, firm or entity. Except as set forth in the Retention Order, no promises concerning compensation have been made to KPMG by any firm, person or entity.

### Summary of Actual and Necessary Expenses During the Compensation Period

16. As set forth on Exhibit D and D1 of each monthly fee application, KPMG is not seeking reimbursement of actual and necessary expenses incurred by KPMG during the Compensation Period.

#### Reservation

17. To the extent that time or disbursement charges for services rendered or disbursements incurred relate to the Compensation Period but were not processed prior to the preparation of this Joint Application, KPMG reserves the right to request additional compensation for such services and reimbursement of such expenses in a future application. Furthermore, KPMG reserves the right to seek interim approval of the fees and expenses requested herein.

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### **Conclusion**

17. WHEREFORE, subject to the terms of the Interim Compensation Order, KPMG respectfully requests (a) approving and allowing, on an interim basis, compensation in the amount of \$650,638.50 for professional services performed on behalf of the Debtors and the Committee during the Compensation Period of June 1, 2020 through September 30, 2020 and reimbursement of \$0.00 for actual and necessary expenses incurred during the Compensation Period; (b) authorizing and directing the Debtors and the Committee to pay KPMG an amount equal to the sum of such allowed compensation and reimbursement; and (c) granting such other further relief as the Court deems just and proper.

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Dated: November 11, 2020

Respectfully submitted:

/s/ Howard Steinberg

Howard Steinberg Partner, KPMG LLP 1350 Avenue of the Americas New York, New York 10019 19-23649-shl Doc 1921 Filed 11/11/20 Entered 11/11/20 17:40:39 Main Document Pg 14 of 128

### **Schedule 1**

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### UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

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In re:	:	Chapter 11

PURDUE PHARMA L.P., et al., : Case No. 19-23649 (RDD)

Debtors.<sup>1</sup> : (Jointly Administered)

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# SIXTH MONTHLY FEE STATEMENT OF KPMG LLP FOR COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED AS TAX CONSULTANT FOR THE DEBTORS AND THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR THE PERIOD FROM JUNE 1, 2020 THROUGH JUNE 30, 2020

Name of Applicant:	KPMG 1	LLP				
Authorized to Provide Professional Services to:	Provide Professional Services to: The Debtors and the Official Con Unsecured Creditors					
Date of Retention:	February 24, 2020, nunc pro tunc to December 23, 2019					
Period for Which Compensation and Reimbursement is Sought:	June 1, 2020 through June 30, 2020					
Amount of Compensation Sought as Actual, Reasonable, and Necessary:	\$	204,044.40				
Less 20% Holdback:	\$	(40,808.88)				
Amount of Expense Reimbursement Sought as Actual, Reasonable, and Necessary:	\$	0.00				
Total Fees and Expenses Due:	\$	163,235.52				

The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

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Dated: August 5, 2020

/s/ Howard Steinberg
Howard Steinberg
Partner, KPMG LLP
1350 Avenue of the Americas
New York, New York 10019

(212) 872-6562

### **19-23649**-std **Doc 1928 Filed D8/D5/20 Entered D8/D5/20 12:43:39 Main Document** Pgg.3 of 328

#### **EXHIBIT A**

### Purdue Pharma L.P. Case No. 19-23649

Summary Of Hours and Discounted Fees Incurred By Professional June 1, 2020 through June 30, 2020

Professional Person	Position & Department	Country of Origin	Total Billed Hours	Hot	urly Billing Rate	Co	Total ompensation
Alan Zhao	Senior Manager - Tax	US	2.2	\$	695	\$	1,529.00
Alejandro Merelles Rodriguez	Senior Associate - Tax	Luxembourg	6.8	\$	640	\$	4,352.00
Aroen Rambhadjan	Partner - Tax	Netherlands	3.2	\$	884	\$	2,828.80
Arpit Desai	Senior Manager - Tax	UK	0.4	\$	750	\$	300.00
Ashley Armfield	Senior Associate - M&A Tax	US	16.3	\$	534	\$	8,704.20
Becky Holtje	Senior Manager - Washington National Tax	US	40.3	\$	744	\$	29,983.20
Bela Unell	Senior Manager - Washington National Tax	US	3.0	\$	744	\$	2,232.00
Casey Nunez	Senior Manager - M&A Tax	US	21.5	\$	744	\$	15,996.00
Danielle Moloughney	Associate - Tax	Canada	1.5	\$	172	\$	258.00
Devon Rowles	Associate - M&A Tax	US	32.1	\$	350	\$	11,235.00
Douglas Holland	Principal - Washington National Tax	US	2.8	\$	985	\$	2,758.00
Emilien Lebas	Partner - Tax	Luxembourg	3.0	\$	985	\$	2,955.00
Frankie Angeleri	Associate - Economic & Valuation Services	US	13.4	\$	520	\$	6,968.00
Fred van Horzen	Partner - Tax	Netherlands	0.2	\$	884	\$	176.80
Gavin Little	Managing Director - Tax	UK	0.4	\$	985	\$	394.00
Gregory Bell	Partner - Tax	Canada	3.0	\$	743	\$	2,229.00
Howard Steinberg	Partner - M&A Tax	US	1.8	\$	856	\$	1,540.80
Isaac Hirsch	Managing Director - Int'l Tax	US	47.6	\$	819	\$	38,984.40
Jess Commisso	Associate - M&A Tax	US	65.6	\$	350	\$	22,960.00
Jonas Lau	Senior Manager - Tax	Canada	5.9	\$	614	\$	3,622.60
Kieran Taylor	Senior Manager - Tax	US	6.7	\$	744	\$	4,984.80
Lukas van der Veen	Manager - Tax	Netherlands	8.4	\$	565	\$	4,746.00
Madeleine Latham	Associate - Tax	UK	0.4	\$	343	\$	137.20
Mark Hoffenberg	Principal - Washington National Tax	US	2.6	\$	980	\$	2,548.00
Molly Minnear	Principal - Economic & Valuation Services	US	1.7	\$	868	\$	1,475.60
Monica Plangman	Associate Director - Bankruptcy	US	4.9	\$	264	\$	1,293.60
Paul Harden	Managing Director - Tax	UK	3.4	\$	985	\$	3,349.00
Pete DiMatteo	Manager - Int'l Tax	US	14.1	\$	650	\$	9,165.00
Ray Bosques	Associate - M&A Tax	US	0.8	\$	350	\$	280.00
Rob Keller	Managing Director - Washington National Tax	US	1.7	\$	893	\$	1,518.10
Robin Lijzenga	Manager - Tax	Luxembourg	4.5	\$	730	\$	3,285.00
Sam Tyler	Partner - Tax	Canada	2.3	\$	743	\$	1,708.90
Sara Gonzalez Perez	Associate - Tax	Luxembourg	7.0	\$	380	\$	2,660.00
Teresa Williams	Associate - Bankruptcy	US	6.3	\$	140	\$	882.00
Tracy Stone	Principal - Washington National Tax	US	1.7	\$	906	\$	1,540.20
Wendy Shaffer	Manager - Bankruptcy	US	22.1	\$	202	\$	4,464.20
Subtotal of Hours and Discoun			359.6	Ψ	_0_	<u>\$</u>	204,044.40
	100 1 000	;	337.0			Ψ.	•
Total Discounted Fees						\$	204,044.40
Out of Pocket Expenses	_					\$	-
Total Fees and Out of Pocket I	<del>-</del>					\$	204,044.40
Less Holdback Adjustment (20%						\$	(40,808.88)
Net Requested Fees & Out of I	Pocket Expenses					\$	163,235.52
DI 1111 1 D 4				Φ.	567.43		

**Blended Hourly Rate** 

\$

567.42

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#### **EXHIBIT B**

### Purdue Pharma L.P. Case No. 19-23649

Summary of Hours and Discounted Fees Incurred by Category June 1, 2020 through June 30, 2020

Category	Exhibit	Total Billed Hours	Total Fees Requested
Bankruptcy Tax Consulting Services	C1	326.3	\$ 197,404.60
Non -Working Travel Time	C2	0.0	\$ -
Retention Services	C3	0.0	\$ -
Fee Application Preparation Services	C4	33.3	\$ 6,639.80
Total		359.6	\$ 204,044.40

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### EXHIBIT C1

#### Purdue Pharma L.P. Case No. 19-23649

Name	Date	Description	Hours	Rate	Amount
Ashley Armfield	06/01/20	(0.6) Discussion between A. Armfield, J. Commisso, and D. Rowles (KPMG) to discuss updates and next steps related to the Purdue cash tax model as of 6/1/2020.	0.6	\$ 534	\$ 320.40
Devon Rowles	06/01/20	(0.6) Discussion between A. Armfield, J. Commisso, and D. Rowles (KPMG) to discuss updates and next steps related to the Purdue cash tax model as of 6/1/2020.	0.6	\$ 350	\$ 210.00
Jess Commisso	06/01/20	(0.6) Discussion between A. Armfield, J. Commisso, and D. Rowles (KPMG) to discuss updates and next steps related to the Purdue cash tax model as of 6/1/2020.	0.6	\$ 350	\$ 210.00
Molly Minnear	06/01/20	(0.6) Review of certain documents in order to prepare for upcoming discussion with KPMG project team.	0.6	\$ 868	\$ 520.80
Danielle Moloughney	06/01/20	(0.6) Associate level review (from Canadian tax perspective) of slide deck sent by KPMG US with regards to a potential disposition.	0.6	\$ 172	\$ 103.20
Bela Unell	06/01/20	Conference call with B. Unell - partial attendance, I. Hirsch, C. Nunez, R. Holtje and P. DiMatteo (KPMG) to discuss and refine research regarding potential tax deductions.	0.5	\$ 744	\$ 372.00
Becky Holtje	06/01/20	Conference call with B. Unell - partial attendance, I. Hirsch, C. Nunez, R. Holtje and P. DiMatteo (KPMG) to discuss and refine research regarding potential tax deductions.	0.6	\$ 744	\$ 446.40
Casey Nunez	06/01/20	Conference call with B. Unell - partial attendance, I. Hirsch, C. Nunez, R. Holtje and P. DiMatteo (KPMG) to discuss and refine research regarding potential tax deductions.	0.6	\$ 744	\$ 446.40
Isaac Hirsch	06/01/20	Conference call with B. Unell - partial attendance, I. Hirsch, C. Nunez, R. Holtje and P. DiMatteo (KPMG) to discuss and refine research regarding potential tax deductions.	0.6	\$ 819	\$ 491.40
Pete DiMatteo	06/01/20	Conference call with B. Unell - partial attendance, I. Hirsch, C. Nunez, R. Holtje and P. DiMatteo (KPMG) to discuss and refine research regarding potential tax deductions.	0.6	\$ 650	\$ 390.00
Ashley Armfield	06/01/20	(0.8) Discussion between A. Armfield and D. Rowles (KPMG) to discuss effective tax rate by Mundipharma entity pursuant to creating sensitivity analysis for the Purdue cash tax model	0.8	\$ 534	\$ 427.20
Devon Rowles	06/01/20	(0.8) Discussion between A. Armfield and D. Rowles (KPMG) to discuss effective tax rate by Mundipharma entity pursuant to creating sensitivity analysis for the Purdue cash tax model	0.8	\$ 350	\$ 280.00
Ashley Armfield	06/01/20	(0.8) Discussion with I. Hirsch, A. Armfield and J. Commisso (KPMG) regarding the allocation alternatives and sensitivity analysis updates within the cash tax model as of 6/1/2020.	0.8	\$ 534	\$ 427.20

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### EXHIBIT C1

#### Purdue Pharma L.P. Case No. 19-23649

Bankruptcy Tax Consulting Services June 1, 2020 through June 30, 2020

Name	Date	Description	Hours	Rate	Amount
Isaac Hirsch	06/01/20	(0.8) Discussion with I. Hirsch, A. Armfield and J. Commisso (KPMG) regarding the allocation alternatives and sensitivity analysis updates within the cash tax model as of 6/1/2020.	0.8	\$ 819	\$ 655.20
Jess Commisso	06/01/20	(0.8) Discussion with I. Hirsch, A. Armfield and J. Commisso (KPMG) regarding the allocation alternatives and sensitivity analysis updates within the cash tax model as of 6/1/2020.	0.8	\$ 350	\$ 280.00
Isaac Hirsch	06/01/20	(1.1) Performed Managing Director review of latest round of updates to sensitivity analysis for cash tax model.	1.1	\$ 819	\$ 900.90
Devon Rowles	06/01/20	(1.1) Updates to assigned portion of Purdue cash tax model based on results of discussion with A. Armfield (KPMG Senior Associate).	1.1	\$ 350	\$ 385.00
Kieran Taylor	06/01/20	·	1.4	\$ 744	\$ 1,041.60
Jess Commisso	06/01/20	(2.2) Continued, on same day, to update the Purdue cash tax model pursuant to changes in value allocation.	2.2	\$ 350	\$ 770.00
Becky Holtje	06/01/20	(2.8) Performed research to facilitate cash tax modeling, relating to certain potential deductions	2.8	\$ 744	\$ 2,083.20
Jess Commisso	06/01/20	(3.9) Updates to the Purdue cash tax model pursuant to changes in value allocation.	3.9	\$ 350	\$ 1,365.00
Ashley Armfield	06/02/20	Conference call between I. Hirsch, C. Nunez, P. DiMatteo, A. Armfield (KPMG US), P. Harden, G. Little, A. Desai, and M. Latham (KPMG UK) to discuss structuring and United Kingdom tax considerations associated with the contemplated disposition of various Mundipharma entities.	0.4	\$ 534	\$ 213.60
Casey Nunez	06/02/20	Conference call between I. Hirsch, C. Nunez, P. DiMatteo, A. Armfield (KPMG US), P. Harden, G. Little, A. Desai, and M. Latham (KPMG UK) to discuss structuring and United Kingdom tax considerations associated with the contemplated disposition of various Mundipharma entities.	0.4	\$ 744	\$ 297.60
Gavin Little	06/02/20	Conference call between I. Hirsch, C. Nunez, P. DiMatteo, A. Armfield (KPMG US), P. Harden, G. Little, A. Desai, and M. Latham (KPMG UK) to discuss structuring and United Kingdom tax considerations associated with the contemplated disposition of various Mundipharma entities.	0.4	\$ 985	\$ 394.00
Isaac Hirsch	06/02/20	Conference call between I. Hirsch, C. Nunez, P. DiMatteo, A. Armfield (KPMG US), P. Harden, G. Little, A. Desai, and M. Latham (KPMG UK) to discuss structuring and United Kingdom tax considerations associated with the contemplated disposition of various Mundipharma entities.	0.4	\$ 819	\$ 327.60

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### EXHIBIT C1

#### Purdue Pharma L.P. Case No. 19-23649

Bankruptcy Tax Consulting Services June 1, 2020 through June 30, 2020

Name	Date	Description	Hours	Rate	Amount
Pete DiMatteo	06/02/20	Conference call between I. Hirsch, C. Nunez, P. DiMatteo, A. Armfield (KPMG US), P. Harden, G. Little, A. Desai, and M. Latham (KPMG UK) to discuss structuring and United Kingdom tax considerations associated with the contemplated disposition of various Mundipharma entities.	0.4	\$ 650	\$ 260.00
Arpit Desai	06/02/20	Conference call between I. Hirsch, C. Nunez, P. DiMatteo, A. Armfield, P. Harden, G. Little, A. Desai, and M. Latham (KPMG) to discuss structuring and United Kingdom tax considerations associated with the contemplated disposition of various Mundipharma entities.	0.4	\$ 750	\$ 300.00
Madeleine Latham	06/02/20	Conference call between I. Hirsch, C. Nunez, P. DiMatteo, A. Armfield, P. Harden, G. Little, A. Desai, and M. Latham (KPMG) to discuss structuring and United Kingdom tax considerations associated with the contemplated disposition of various Mundipharma entities.	0.4	\$ 343	\$ 137.20
Paul Harden	06/02/20	Conference call between I. Hirsch, C. Nunez, P. DiMatteo, A. Armfield, P. Harden, G. Little, A. Desai, and M. Latham (KPMG) to discuss structuring and United Kingdom tax considerations associated with the contemplated disposition of various Mundipharma entities.	0.4	\$ 985	\$ 394.00
Danielle Moloughney	06/02/20	Continued (from previous day) associate level review (from Canadian tax perspective) of slide deck sent by KPMG US with regards to a potential disposition.	0.4	\$ 172	\$ 68.80
Frankie Angeleri	06/02/20	(0.5) Meeting with M. Minnear, K. Taylor and F. Angeleri (KPMG) to discuss transfer pricing materials we have received to date and next steps related to analysis as of $6/2/2020$ .	0.5	\$ 520	\$ 260.00
Kieran Taylor	06/02/20	(0.5) Meeting with M. Minnear, K. Taylor and F. Angeleri (KPMG) to discuss transfer pricing materials we have received to date and next steps related to analysis as of 6/2/2020.	0.5	\$ 744	\$ 372.00
Molly Minnear	06/02/20	(0.5) Meeting with M. Minnear, K. Taylor and F. Angeleri (KPMG) to discuss transfer pricing materials we have received to date and next steps related to analysis as of 6/2/2020.	0.5	\$ 868	\$ 434.00
Alan Zhao	06/02/20	(0.5) Updated PowerBI dashboard template to include additional calculation measures / formulas to show sensitivity results from Purdue cash tax model.	0.5	\$ 695	\$ 347.50
Jess Commisso	06/02/20	(0.8) Discussion with R. Bosques and J. Commisso (KPMG) regarding creation of PowerBI charts pursuant to displaying comparison of various disposition scenarios of Mundipharma entities.	0.8	\$ 350	\$ 280.00

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### EXHIBIT C1

### Purdue Pharma L.P. Case No. 19-23649

Name	Date	Description	Hours	Rate	Amount
Ray Bosques	06/02/20	(0.8) Discussion with R. Bosques and J. Commisso (KPMG) regarding creation of PowerBI charts pursuant to displaying comparison of various disposition scenarios of Mundipharma entities.	0.8	\$ 350	\$ 280.00
Aroen Rambhadjan	06/02/20	(1.2) Netherlands Partner review of comments for deck describing alternative scenario on disposition of Dutch Entity initially prepared by L. van der Veen (KPMG Netherlands).	1.2	\$ 884	\$ 1,060.80
Devon Rowles	06/02/20	(1.3) Reviewed the virtual data room for tax relevant information received as of 6/5/2020 in order to notify the broader KPMG US team about tax relevant documents received.	1.3	\$ 350	\$ 455.00
Ashley Armfield	06/02/20	(1.3) Senior Associate review of sensitivity analysis prepared relating to the cash tax model, with regards to various valuations and the impact on cash taxes, pursuant to providing to investment bankers / legal counsel representing the debtor as well as the unsecured creditors committee	1.3	\$ 534	\$ 694.20
Jess Commisso	06/02/20	(1.4) Continued (same day) to update the Purdue cash tax model pursuant to changes to sensitivity analysis / removal of disposition entity.	1.4	\$ 350	\$ 490.00
Kieran Taylor	06/02/20	(1.4) Analysis of certain Mundipharma relationships from a Transfer Pricing perspective.	1.4	\$ 744	\$ 1,041.60
Jonas Lau	06/02/20	Prepared potential Canadian tax comments for slide deck prepared by KPMG US regarding potential dispositions	1.5	\$ 614	\$ 921.00
Becky Holtje	06/02/20	(1.7) Perform research, as of 6/2/2020, to facilitate cash tax modeling, relating to certain potential deductions	1.7	\$ 744	\$ 1,264.80
Lukas van der Veen	06/02/20	Draft comments for deck describing alternative scenario on disposition of Netherlands Mundipharma entity via a proposed disposition in preparation to send to P. DiMatteo (KPMG US).	3.1	\$ 565	\$ 1,751.50
Jess Commisso	06/02/20	(3.9) Creation of PowerBI visual charts to display sensitivity analysis scenarios and global cash tax liability / net proceeds following disposition of Mundipharma entities.	3.9	\$ 350	\$ 1,365.00
Jess Commisso	06/02/20	(3.9) Updates to designated portion of the cash tax model, as of 6/2/2020, pursuant to changes to sensitivity analysis / removal of disposition entity.	3.9	\$ 350	\$ 1,365.00
Lukas van der Veen	06/03/20	Review e-mail communication with I. Hirsch (KPMG US) on potential disposition of a Netherlands Mundipharma entity.	0.2	\$ 565	\$ 113.00

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### EXHIBIT C1

### Purdue Pharma L.P. Case No. 19-23649

Bankruptcy Tax Consulting Services June 1, 2020 through June 30, 2020

Name	Date	Description	Hours	Rate	Amount
Alan Zhao	06/03/20	(0.5) Updated PowerBI dashboard template for M&A Tax Team C. Nunez and A. Armfield (KPMG) by adding conditional column within the PowerBI queries to produce meaningful visuals in connection with the Purdue cash tax model.	0.5	\$ 695	\$ 347.50
Casey Nunez	06/03/20	(0.8) Performed M&A Tax Senior Manager review of updates to information request list as of 6/3/2020.	0.8	\$ 744	\$ 595.20
Devon Rowles	06/03/20	(1.1) Updates to assigned portion of Purdue cash tax model with regards to review comments received from A. Armfield (KPMG Senior Associate) as of 6/3/2020.	1.1	\$ 350	\$ 385.00
Jess Commisso	06/03/20	Continued (same day) to perform updates to designated portion of Purdue cash tax model per review comments received from A. Armfield (KPMG Senior Associate) as of 6/3/2020.	1.2	\$ 350	\$ 420.00
Sam Tyler	06/03/20	Perform International Canadian Partner review of slide deck with regards to a contemplated disposition of a Canadian entity	1.3	\$ 743	\$ 965.90
Gregory Bell	06/03/20	Perform Domestic Canadian Partner review of slide deck with regards to a contemplated disposition of a Canadian entity	2.0	\$ 743	\$ 1,486.00
Becky Holtje	06/03/20	(3.2) Performed research, as of 6/3/2020, to facilitate cash tax modeling, relating to certain potential deductions	3.2	\$ 744	\$ 2,380.80
Isaac Hirsch	06/03/20	(1.3) Managing Director review of updated sensitivity analysis for global cash tax model; (1.8) Analysis of availability of potential tax deduction for certain payments; (0.8) Managing Director review of advice from Netherlands tax specialist regarding treaty application for potential sale	3.9	\$ 819	\$ 3,194.10
Jess Commisso	06/03/20	(3.9) Updates to the PowerBI visuals per review comments received from A. Armfield (KPMG Senior Associate) as of 6/3/2020.	3.9	\$ 350	\$ 1,365.00
Jess Commisso	06/03/20	(3.9) Updates to designated portion of the Purdue cash tax model per review comments received from A. Armfield (KPMG Senior Associate) as of 6/3/2020.	3.9	\$ 350	\$ 1,365.00
Alan Zhao	06/04/20	(0.5) Updated PowerBI dashboard template with regards to requests from M&A Tax Team (C. Nunez and A. Armfield) as of $6/4/2020$ .	0.5	\$ 695	\$ 347.50
Devon Rowles	06/04/20	(0.7) Updated assigned portion of Purdue cash tax model with regards to review comments received from KPMG senior associate (A. Armfield) specifically related to the Power BI charts for sensitivity analysis	0.7	\$ 350	\$ 245.00

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### EXHIBIT C1

### Purdue Pharma L.P. Case No. 19-23649

Bankruptcy Tax Consulting Services June 1, 2020 through June 30, 2020

Name	Date	Description	Hours	Rate	Amount
Bela Unell	06/04/20	Conference call with T. Stone, B. Unell - partial attendance, R. Keller, I. Hirsch, C. Nunez, R. Holtje and P. DiMatteo (KPMG) to further discuss and refine research regarding potential tax deductions.	0.7	\$ 744	\$ 520.80
Becky Holtje	06/04/20	Conference call with T. Stone, B. Unell - partial attendance, R. Keller, I. Hirsch, C. Nunez, R. Holtje and P. DiMatteo (KPMG) to further discuss and refine research regarding potential tax deductions.	0.9	\$ 744	\$ 669.60
Casey Nunez	06/04/20	Conference call with T. Stone, B. Unell - partial attendance, R. Keller, I. Hirsch, C. Nunez, R. Holtje and P. DiMatteo (KPMG) to further discuss and refine research regarding potential tax deductions.	0.9	\$ 744	\$ 669.60
Isaac Hirsch	06/04/20	Conference call with T. Stone, B. Unell - partial attendance, R. Keller, I. Hirsch, C. Nunez, R. Holtje and P. DiMatteo (KPMG) to further discuss and refine research regarding potential tax deductions.	0.9	\$ 819	\$ 737.10
Pete DiMatteo	06/04/20	Conference call with T. Stone, B. Unell - partial attendance, R. Keller, I. Hirsch, C. Nunez, R. Holtje and P. DiMatteo (KPMG) to further discuss and refine research regarding potential tax deductions.	0.9	\$ 650	\$ 585.00
Rob Keller	06/04/20	Conference call with T. Stone, B. Unell - partial attendance, R. Keller, I. Hirsch, C. Nunez, R. Holtje and P. DiMatteo (KPMG) to further discuss and refine research regarding potential tax deductions.	0.9	\$ 893	\$ 803.70
Tracy Stone	06/04/20	Conference call with T. Stone, B. Unell - partial attendance, R. Keller, I. Hirsch, C. Nunez, R. Holtje and P. DiMatteo (KPMG) to further discuss and refine research regarding potential tax deductions.	0.9	\$ 906	\$ 815.40
Becky Holtje	06/04/20	(1.2) Perform research, as of 6/4/2020, to facilitate cash tax modeling, relating to certain potential deductions	1.2	\$ 744	\$ 892.80
Jonas Lau	06/04/20	Updated Canadian tax comments (per request of KPMG US) in slide deck prepared by KPMG US related to potential disposition alternative for a Canadian entity.	1.5	\$ 614	\$ 921.00
Kieran Taylor	06/04/20	(1.6) Performed analysis of transfer pricing summary as prepared by EY - with focus on background as to the existing transfer pricing framework of Purdue.	1.6	\$ 744	\$ 1,190.40
Isaac Hirsch	06/04/20	(1.4) Managing Director review of updated sensitivity analysis for global cash tax model as of 6/4/2020; (0.4) Managing Director review of information request lists for updates to cash tax model and analysis of potential NOL carryback.	1.8	\$ 819	\$ 1,474.20
Ashley Armfield	06/04/20	(2.1) Drafted review comments related to cash tax model updates / presentation for upcoming Purdue banker call.	2.1	\$ 534	\$ 1,121.40

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### EXHIBIT C1

#### Purdue Pharma L.P. Case No. 19-23649

Name	Date	Description	Hours	Rate	Amount
Lukas van der Veen	06/04/20	Draft comments for deck describing alternative scenario on disposition of Netherlands Mundipharma entity in preparation to send to I. Hirsch (KPMG US).	2.4	\$ 565	\$ 1,356.00
Jess Commisso	06/04/20	(3.9) Updated the PowerBI visuals per review comments received from A. Armfield (KPMG Senior Associate) as of 6/4/2020.	3.9	\$ 350	\$ 1,365.00
Ashley Armfield	06/05/20	(0.6) Drafting assumptions to include in new deliverable for sensitivity analysis surrounding the cash tax model.	0.6	\$ 534	\$ 320.40
Alan Zhao	06/05/20	(0.7) Updated PowerBI dashboard template for M&A Tax Team C. Nunez and A. Armfield (KPMG) to bring in Alternate value allocation tab data from Purdue Cash Tax model.	0.7	\$ 695	\$ 486.50
Becky Holtje	06/05/20	(1.2) Perform research, as of 6/5/2020, to facilitate cash tax modeling, relating to certain potential deductions	1.2	\$ 744	\$ 892.80
Isaac Hirsch	06/05/20	(1.2) Perform Managing Director review of sensitivity analysis, as of 6/5/2020, with respect to cash tax analysis.	1.2	\$ 819	\$ 982.80
Jess Commisso	06/05/20	(2.2) Continued (from earlier in the day) to update the PowerBI visuals per review comments received from I. Hirsch (KPMG Managing Director) as of 6/5/2020.	2.2	\$ 350	\$ 770.00
Casey Nunez	06/05/20	(2.2) Performed M&A Tax Senior Manager review of valuation sensitivity analysis deliverable as of 6/5/2020.	2.2	\$ 744	\$ 1,636.80
Jess Commisso	06/05/20	(3.9) Updates to the PowerBI visuals per review comments received from I. Hirsch (KPMG Managing Director) as of 6/5/2020.	3.9	\$ 350	\$ 1,365.00
Becky Holtje	06/08/20	(0.1) Continued, same day, to perform research to facilitate cash tax modeling, relating to certain potential deductions	0.1	\$ 744	\$ 74.40
Lukas van der Veen	06/08/20	(0.4) Finalize comments included in deck on the alternative disposition of a dutch entity following review by A. Rambhadjan (KPMG Netherlands). Slide deck has been shared with KPMG US on June 8, 2020.	0.4	\$ 565	\$ 226.00
Sam Tyler	06/08/20	Performed International Canadian Partner review of final version of slide deck related to contemplated disposition of a Canadian entity - prior to providing to KPMG US.	0.5	\$ 743	\$ 371.50
Gregory Bell	06/08/20	Performed Domestic Canadian Partner review of final version of slide deck prepared by KPMG Canada staff related to contemplated disposition of a Canadian entity	0.5	\$ 743	\$ 371.50
Danielle Moloughney	06/08/20	Conference call with (S. Tyler, G. Bell, J. Lau and D. Moloughney) (all KPMG Canada) project team to discuss planning idea for the contemplated disposition of a Canadian entity.	0.5	\$ 172	\$ 86.00

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### EXHIBIT C1

#### Purdue Pharma L.P. Case No. 19-23649

Name	Date	Description	Hours	Rate	Amount
Gregory Bell	06/08/20	Conference call with (S. Tyler, G. Bell, J. Lau and D. Moloughney) (all KPMG Canada) project team to discuss planning idea for the contemplated disposition of a Canadian entity.	0.5	\$ 743	\$ 371.50
Jonas Lau	06/08/20	Conference call with (S. Tyler, G. Bell, J. Lau and D. Moloughney) (all KPMG Canada) project team to discuss planning idea for the contemplated disposition of a Canadian entity.	0.5	\$ 614	\$ 307.00
Sam Tyler	06/08/20	Conference call with (S. Tyler, G. Bell, J. Lau and D. Moloughney) (all KPMG Canada) project team to discuss planning idea for the contemplated disposition of a Canadian entity.	0.5	\$ 743	\$ 371.50
Pete DiMatteo	06/08/20	(0.6) Review proposed settlement term sheet to identify potential claims for purposes of correspondence with T. Stone (KPMG)	0.6	\$ 650	\$ 390.00
Casey Nunez	06/08/20	(0.7) Continued to perform M&A Tax Senior Manager review of updated valuation sensitivity analysis deliverable	0.7	\$ 744	\$ 520.80
Rob Keller	06/08/20	(0.8) Conference call with T. Stone and R. Keller (KPMG) to further discuss and refine research regarding potential tax deductions.	0.8	\$ 893	\$ 714.40
Tracy Stone	06/08/20	(0.8) Conference call with T. Stone and R. Keller (KPMG) to further discuss and refine research regarding potential tax deductions.	0.8	\$ 906	\$ 724.80
Aroen Rambhadjan	06/08/20	(0.9) Partner review comments (initially prepared by L. van der Veen -KPMG Netherlands tax specialist) included in deck on the alternative disposition of Dutch entity.	0.9	\$ 884	\$ 795.60
Jonas Lau	06/08/20	(1.1) Finalized slide deck regarding planning alternatives and (0.4) drafted responses to questions from KPMG US related to same	1.5	\$ 614	\$ 921.00
Devon Rowles	06/08/20	(1.8) Updates to Purdue cash tax model per KPMG Managing Director (I. Hirsch) review comments, specifically with respect to the Power BI charts for sensitivity analysis	1.8	\$ 350	\$ 630.00
Isaac Hirsch	06/08/20	(0.8) Finalize information request list to send Norton Rose for purposes of refining global cash tax model; (1.3) Managing Director review of valuation sensitivity analysis for cash tax model as of 6/8/2020; (0.4) Managing Director review of correspondence with KPMG Washington National Tax regarding potential deductions.	2.5	\$ 819	\$ 2,047.50
Devon Rowles	06/08/20	(3.1) Updated assigned portion of Purdue cash tax model per KPMG senior associate (A. Armfield) review comments, specifically with respect to the Power BI charts for sensitivity analysis	3.1	\$ 350	\$ 1,085.00

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### EXHIBIT C1

### Purdue Pharma L.P. Case No. 19-23649

Name	Date	Description	Hours	Rate	Amount
Becky Holtje	06/08/20	(3.9) Perform research, as of 6/8/2020, to facilitate cash tax modeling, relating to certain potential deductions	3.9	\$ 744	\$ 2,901.60
Jess Commisso	06/08/20	(3.9) Updates to the PowerBI visuals per review comments received from I. Hirsch (KPMG Managing Director) as of 6/8/2020.	3.9	\$ 350	\$ 1,365.00
Becky Holtje	06/09/20	(0.7) Continued, same day, to perform research to facilitate cash tax modeling, relating to certain potential deductions	0.7	\$ 744	\$ 520.80
Pete DiMatteo	06/09/20	Performed international tax manager preparation of PowerPoint slides depicting proposed planning related to contemplated Canadian (2.2) and Dutch (1.2) dispositions.	3.4	\$ 650	\$ 2,210.00
Becky Holtje	06/09/20	(3.9) Perform research, as of 6/9/2020, to facilitate cash tax modeling, relating to certain potential deductions	3.9	\$ 744	\$ 2,901.60
Ashley Armfield	06/10/20	(0.8) Discussion with H. Steinberg, M. Hoffenberg, D. Holland, B. Unell, C. Nunez, I. Hirsch, P. DiMatteo, A. Armfield, and J. Commisso (KPMG) regarding review of client deliverable of sensitivity analysis charts and additional information requests.	0.8	\$ 534	\$ 427.20
Bela Unell	06/10/20	(0.8) Discussion with H. Steinberg, M. Hoffenberg, D. Holland, B. Unell, C. Nunez, I. Hirsch, P. DiMatteo, A. Armfield, and J. Commisso (KPMG) regarding review of client deliverable of sensitivity analysis charts and additional information requests.	0.8	\$ 744	\$ 595.20
Casey Nunez	06/10/20	(0.8) Discussion with H. Steinberg, M. Hoffenberg, D. Holland, B. Unell, C. Nunez, I. Hirsch, P. DiMatteo, A. Armfield, and J. Commisso (KPMG) regarding review of client deliverable of sensitivity analysis charts and additional information requests.	0.8	\$ 744	\$ 595.20
Douglas Holland	06/10/20	(0.8) Discussion with H. Steinberg, M. Hoffenberg, D. Holland, B. Unell, C. Nunez, I. Hirsch, P. DiMatteo, A. Armfield, and J. Commisso (KPMG) regarding review of client deliverable of sensitivity analysis charts and additional information requests.	0.8	\$ 985	\$ 788.00
Howard Steinberg	06/10/20	(0.8) Discussion with H. Steinberg, M. Hoffenberg, D. Holland, B. Unell, C. Nunez, I. Hirsch, P. DiMatteo, A. Armfield, and J. Commisso (KPMG) regarding review of client deliverable of sensitivity analysis charts and additional information requests.	0.8	\$ 856	\$ 684.80
Isaac Hirsch	06/10/20	(0.8) Discussion with H. Steinberg, M. Hoffenberg, D. Holland, B. Unell, C. Nunez, I. Hirsch, P. DiMatteo, A. Armfield, and J. Commisso (KPMG) regarding review of client deliverable of sensitivity analysis charts and additional information requests.	0.8	\$ 819	\$ 655.20

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### EXHIBIT C1

### Purdue Pharma L.P. Case No. 19-23649

Bankruptcy Tax Consulting Services June 1, 2020 through June 30, 2020

Name	Date	Description	Hours	Rate	Amount
Jess Commisso	06/10/20	(0.8) Discussion with H. Steinberg, M. Hoffenberg, D. Holland, B. Unell, C. Nunez, I. Hirsch, P. DiMatteo, A. Armfield, and J. Commisso (KPMG) regarding review of client deliverable of sensitivity analysis charts and additional information requests.	0.8	\$ 350	\$ 280.00
Mark Hoffenberg	06/10/20	(0.8) Discussion with H. Steinberg, M. Hoffenberg, D. Holland, B. Unell, C. Nunez, I. Hirsch, P. DiMatteo, A. Armfield, and J. Commisso (KPMG) regarding review of client deliverable of sensitivity analysis charts and additional information requests.	0.8	\$ 980	\$ 784.00
Pete DiMatteo	06/10/20	(0.8) Discussion with H. Steinberg, M. Hoffenberg, D. Holland, B. Unell, C. Nunez, I. Hirsch, P. DiMatteo, A. Armfield, and J. Commisso (KPMG) regarding review of client deliverable of sensitivity analysis charts and additional information requests.	0.8	\$ 650	\$ 520.00
Casey Nunez	06/10/20	(1.1) Performed M&A Tax Senior Manager review of cash tax model updates for valuation sensitivity analysis.	1.1	\$ 744	\$ 818.40
Becky Holtje	06/10/20	(1.6) Perform research, as of 6/10/2020, to facilitate cash tax modeling relating to timing of certain deductions	1.6	\$ 744	\$ 1,190.40
Isaac Hirsch	06/10/20	(1.8) Perform Managing Director review of sensitivity analysis regarding allocation of proceeds between various entities, in preparation for external call with Purdue and UCC legal and financial counsel	1.8	\$ 819	\$ 1,474.20
Ashley Armfield	06/10/20	(2.1) Updating presentation relating to providing external advisors with cash tax sensitivity analysis with regards to Managing Director review comments.	2.1	\$ 534	\$ 1,121.40
Jess Commisso	06/10/20	(2.3) Continued, from earlier in the day, to update the PowerBI visuals per review comments received from I. Hirsch (KPMG Managing Director).	2.3	\$ 350	\$ 805.00
Isaac Hirsch	06/10/20	(0.6) Managing director review of potential Dutch pre-sale planning slides; (0.5) Managing Director review of potential Canadian pre-sale planning slides; (1.5) Managing Director review of valuation sensitivity analysis, in preparation for external call with Purdue and UCC legal and financial counsel.	2.6	\$ 819	\$ 2,129.40
Pete DiMatteo	06/10/20	International tax manager preparation of PowerPoint slides depicting proposed planning related to contemplated Canadian (2.4) and Dutch (1.4) dispositions.	3.8	\$ 650	\$ 2,470.00
Jess Commisso	06/10/20	(3.9) Updates to PowerBI visuals with regards to review comments received from I. Hirsch (KPMG Managing Director) as of 6/10/2020.	3.9	\$ 350	\$ 1,365.00

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### EXHIBIT C1

#### Purdue Pharma L.P. Case No. 19-23649

Bankruptcy Tax Consulting Services June 1, 2020 through June 30, 2020

Name	Date	Description	Hours	Rate	Amount
Ashley Armfield	06/11/20	(0.5) Conference call between D. Holland (KPMG WNT), C. Nunez, I. Hirsch, P. DiMatteo, A. Armfield, and D. Rowles (KPMG) to discuss updates made to the Purdue cash tax model sensitivity analysis in preparation for external call with advisors.	0.5	\$ 534	\$ 267.00
Devon Rowles	06/11/20	(0.5) Conference call between D. Holland (KPMG WNT), C. Nunez, I. Hirsch, P. DiMatteo, A. Armfield, and D. Rowles (KPMG) to discuss updates made to the Purdue cash tax model sensitivity analysis in preparation for external call with advisors.	0.5	\$ 350	\$ 175.00
Douglas Holland	06/11/20	(0.5) Conference call between D. Holland (KPMG WNT), C. Nunez, I. Hirsch, P. DiMatteo, A. Armfield, and D. Rowles (KPMG) to discuss updates made to the Purdue cash tax model sensitivity analysis in preparation for external call with advisors.	0.5	\$ 985	\$ 492.50
Casey Nunez	06/11/20	(0.5) Conference call between D. Holland (KPMG WNT), C. Nunez, I. Hirsch, P. DiMatteo, A. Armfield, and D. Rowles (KPMG) to discuss updates made to the Purdue cash tax model sensitivity analysis in preparation for external call with advisors.	0.5	\$ 744	\$ 372.00
Isaac Hirsch	06/11/20	(0.5) Conference call between D. Holland (KPMG WNT), C. Nunez, I. Hirsch, P. DiMatteo, A. Armfield, and D. Rowles (KPMG) to discuss updates made to the Purdue cash tax model sensitivity analysis in preparation for external call with advisors.	0.5	\$ 819	\$ 409.50
Pete DiMatteo	06/11/20	(0.5) Conference call between D. Holland (KPMG WNT), C. Nunez, I. Hirsch, P. DiMatteo, A. Armfield, and D. Rowles (KPMG) to discuss updates made to the Purdue cash tax model sensitivity analysis in preparation for external call with advisors.	0.5	\$ 650	\$ 325.00
Casey Nunez	06/11/20	(0.8) Performed M&A Tax Senior Manager review of updates to global cash tax model as of 6/11/2020.	0.8	\$ 744	\$ 595.20
Alejandro Merelles Rodriguez	06/11/20	(0.8) Perform Senior Associate level review of the latest slide deck provided by the U.S. team regarding potential Mundipharma Disposition Analysis from Luxembourg tax perspective.	0.8	\$ 640	\$ 512.00
Sara Gonzalez Perez	06/11/20	(0.8) Perform Associate level review of the latest slide deck provided by the U.S. team regarding potential Mundipharma Disposition Analysis from Luxembourg tax perspective.	0.8	\$ 380	\$ 304.00
Jess Commisso	06/11/20	(1.2) Updates to the cash tax model to incorporate scenarios without certain deductions - per the client request.	1.2	\$ 350	\$ 420.00

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### EXHIBIT C1

#### Purdue Pharma L.P. Case No. 19-23649

Name	Date	Description	Hours	Rate	Amount
Lukas van der Veen	06/11/20	Review of Dutch tax comments included in deck on Mundipharma Disposition Analysis Potential Planning Opportunities as requested by P. DiMatteo (KPMG US).	1.3	\$ 565	\$ 734.50
Becky Holtje	06/11/20	(1.4) Perform research, as of 6/11/2020, to facilitate cash tax modeling relating to timing of certain deductions	1.4	\$ 744	\$ 1,041.60
Isaac Hirsch	06/11/20	Prepare for call with legal and financial advisors for Purdue and UCC by: preparing talking points for discussion (0.6); reviewing latest version of Purdue cash tax model (0.9); reviewing prior correspondence from Purdue and UCC legal and financial counsel (0.4).	1.9	\$ 819	\$ 1,556.10
Ashley Armfield	06/11/20	(3.2) Updating deliverable file with regards to Managing Director comments to be discussed on external call on 6/12/2020.	3.2	\$ 534	\$ 1,708.80
Isaac Hirsch	06/11/20	(1.6) Perform Managing Director review of valuation sensitivity analysis, in preparation for external call with Purdue and UCC legal and financial counsel; (1.9) performed Managing Director review of sensitivity analysis regarding allocation of proceeds between various entities, in preparation for external call with Purdue and UCC legal and financial counsel.	3.5	\$ 819	\$ 2,866.50
Sara Gonzalez Perez	06/11/20	Drafted high-level Luxembourg direct tax comments on the proposed dispositions depicted in the Dutch and Canadian Planning slide deck	3.7	\$ 380	\$ 1,406.00
Becky Holtje	06/11/20	(3.9) Continue (from previous day) to perform research to facilitate cash tax modeling relating to timing of certain deductions	3.9	\$ 744	\$ 2,901.60
Jess Commisso	06/11/20	(3.9) Updates to PowerBI visualizations of sensitivity analysis with regards to review comments received from A. Armfield (KPMG Senior associate).	3.9	\$ 350	\$ 1,365.00
Jess Commisso	06/11/20	(3.9) Updates to PowerBI visualizations of sensitivity analysis with regards to review comments received from I. Hirsch (KPMG Managing Director) as of 6/11/2020.	3.9	\$ 350	\$ 1,365.00
Becky Holtje	06/12/20	(0.2) Continue, same day, to perform research to facilitate cash tax modeling relating to timing of certain deductions	0.2	\$ 744	\$ 148.80
Casey Nunez	06/12/20	(0.5) Conference with C. Nunez, D. Holland, and I. Hirsch (KPMG) to discuss preparation for external call with legal and financial advisors for Purdue and the UCC regarding sources of foreign tax in the global cash tax model, sensitivity analysis around effect of changes in valuation on global cash tax liability, and sensitivity analysis around effect of allocation of proceeds on global cash tax liability	0.5	\$ 744	\$ 372.00

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### EXHIBIT C1

### Purdue Pharma L.P. Case No. 19-23649

Name	Date	Description	Hours	Rate	Amount
Douglas Holland	06/12/20	(0.5) Conference with C. Nunez, D. Holland, and I. Hirsch (KPMG) to discuss preparation for external call with legal and financial advisors for Purdue and the UCC regarding sources of foreign tax in the global cash tax model, sensitivity analysis around effect of changes in valuation on global cash tax liability, and sensitivity analysis around effect of allocation of proceeds on global cash tax liability	0.5	\$ 985	\$ 492.50
Isaac Hirsch	06/12/20	(0.5) Conference with C. Nunez, D. Holland, and I. Hirsch (KPMG) to discuss preparation for external call with legal and financial advisors for Purdue and the UCC regarding sources of foreign tax in the global cash tax model, sensitivity analysis around effect of changes in valuation on global cash tax liability, and sensitivity analysis around effect of allocation of proceeds on global cash tax liability	0.5	\$ 819	\$ 409.50
Lukas van der Veen	06/12/20	(0.5) Finalize Manager level review comments included in deck on Mundipharma Disposition Analysis Potential Planning Opportunities (based on review of the deck with KPMG US) in preparation to send to P. DiMatteo (KPMG US).	0.5	\$ 565	\$ 282.50
Aroen Rambhadjan	06/12/20	Partner review of draft comments included in deck on Mundipharma Disposition Analysis Potential Planning Opportunities (based on review of the deck with KPMG US) and concurrently revised - as needed.	0.6	\$ 884	\$ 530.40
Becky Holtje	06/12/20	(1.0) Conference with H. Steinberg, M. Hoffenberg, C. Nunez, D. Holland, P. DiMatteo, B. Unell, R. Holtje, and I. Hirsch (KPMG) and various advisors for Purdue and UCC to discuss sources of foreign tax in the global cash tax model, sensitivity analysis around effect of changes in valuation on global cash tax liability, and sensitivity analysis around effect of allocation of proceeds on global cash tax liability	1.0	\$ 744	\$ 744.00
Bela Unell	06/12/20	(1.0) Conference with H. Steinberg, M. Hoffenberg, C. Nunez, D. Holland, P. DiMatteo, B. Unell, R. Holtje, and I. Hirsch (KPMG) and various advisors for Purdue and UCC to discuss sources of foreign tax in the global cash tax model, sensitivity analysis around effect of changes in valuation on global cash tax liability, and sensitivity analysis around effect of allocation of proceeds on global cash tax liability	1.0	\$ 744	\$ 744.00

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### EXHIBIT C1

### Purdue Pharma L.P. Case No. 19-23649

Name	Date	Description	Hours	Rate	Amount
Casey Nunez	06/12/20	(1.0) Conference with H. Steinberg, M. Hoffenberg, C. Nunez, D. Holland, P. DiMatteo, B. Unell, R. Holtje, and I. Hirsch (KPMG) and various advisors for Purdue and UCC to discuss sources of foreign tax in the global cash tax model, sensitivity analysis around effect of changes in valuation on global cash tax liability, and sensitivity analysis around effect of allocation of proceeds on global cash tax liability	1.0	\$ 744	\$ 744.00
Douglas Holland	06/12/20	(1.0) Conference with H. Steinberg, M. Hoffenberg, C. Nunez, D. Holland, P. DiMatteo, B. Unell, R. Holtje, and I. Hirsch (KPMG) and various advisors for Purdue and UCC to discuss sources of foreign tax in the global cash tax model, sensitivity analysis around effect of changes in valuation on global cash tax liability, and sensitivity analysis around effect of allocation of proceeds on global cash tax liability	1.0	\$ 985	\$ 985.00
Howard Steinberg	06/12/20	(1.0) Conference with H. Steinberg, M. Hoffenberg, C. Nunez, D. Holland, P. DiMatteo, B. Unell, R. Holtje, and I. Hirsch (KPMG) and various advisors for Purdue and UCC to discuss sources of foreign tax in the global cash tax model, sensitivity analysis around effect of changes in valuation on global cash tax liability, and sensitivity analysis around effect of allocation of proceeds on global cash tax liability	1.0	\$ 856	\$ 856.00
Isaac Hirsch	06/12/20	(1.0) Conference with H. Steinberg, M. Hoffenberg, C. Nunez, D. Holland, P. DiMatteo, B. Unell, R. Holtje, and I. Hirsch (KPMG) and various advisors for Purdue and UCC to discuss sources of foreign tax in the global cash tax model, sensitivity analysis around effect of changes in valuation on global cash tax liability, and sensitivity analysis around effect of allocation of proceeds on global cash tax liability	1.0	\$ 819	\$ 819.00
Mark Hoffenberg	06/12/20	(1.0) Conference with H. Steinberg, M. Hoffenberg, C. Nunez, D. Holland, P. DiMatteo, B. Unell, R. Holtje, and I. Hirsch (KPMG) and various advisors for Purdue and UCC to discuss sources of foreign tax in the global cash tax model, sensitivity analysis around effect of changes in valuation on global cash tax liability, and sensitivity analysis around effect of allocation of proceeds on global cash tax liability	1.0	\$ 980	\$ 980.00

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### EXHIBIT C1

### Purdue Pharma L.P. Case No. 19-23649

Bankruptcy Tax Consulting Services June 1, 2020 through June 30, 2020

Name	Date	Description	Hours	Rate	Amount
Pete DiMatteo	06/12/20	(1.0) Conference with H. Steinberg, M. Hoffenberg, C. Nunez, D. Holland, P. DiMatteo, B. Unell, R. Holtje, and I. Hirsch (KPMG) and various advisors for Purdue and UCC to discuss sources of foreign tax in the global cash tax model, sensitivity analysis around effect of changes in valuation on global cash tax liability, and sensitivity analysis around effect of allocation of proceeds on global cash tax liability	1.0	\$ 650	\$ 650.00
Ashley Armfield	06/12/20	(1.1) Additional updates to client deliverable for sensitivity analysis in preparation for discussion (later today).	1.1	\$ 534	\$ 587.40
Paul Harden	06/12/20	Preparation of UK trust tax analysis in response to the query from KPMG US regarding UK tax implications of a potential transfer of proceeds from the proposed transaction ahead of their call with the client.	1.5	\$ 985	\$ 1,477.50
Paul Harden	06/12/20	(1.5) Continued, from same day, preparation of UK trust tax analysis in response to the query from KPMG US.	1.5	\$ 985	\$ 1,477.50
Isaac Hirsch	06/12/20	(0.8) Managing Director review of updated valuation sensitivity analysis, incorporating comments from the KPMG project team as of 6/12/2020; (1.1) Managing Director review of updated sensitivity concerning allocation of proceeds, incorporating comments from KPMG project team as of 6/12/2020.	1.9	\$ 819	\$ 1,556.10
Becky Holtje	06/12/20	$(3.9) \ Performed \ research, \ as \ of \ 6/12/2020, \ to \ facilitate \ cash \ tax \\ modeling \ relating \ to \ timing \ of \ certain \ deductions$	3.9	\$ 744	\$ 2,901.60
Fred van Horzen	06/15/20	Discussion with A. Rambhadjan (KPMG Netherlands), L. van der Veen (KPMG Netherlands) and F. van Horzen (KPMG Netherlands) - partial attendance on potential tax consequences related to disposition of a Dutch entity	0.2	\$ 884	\$ 176.80
Aroen Rambhadjan	06/15/20	Discussion with A. Rambhadjan (KPMG Netherlands), L. van der Veen (KPMG Netherlands) and F. van Horzen (KPMG Netherlands) - partial attendance on potential tax consequences related to disposition of a Dutch entity	0.5	\$ 884	\$ 442.00
Lukas van der Veen	06/15/20	Discussion with A. Rambhadjan (KPMG Netherlands), L. van der Veen (KPMG Netherlands) and F. van Horzen (KPMG Netherlands) - partial attendance on potential tax consequences related to disposition of a Dutch entity	0.5	\$ 565	\$ 282.50
Robin Lijzenga	06/15/20	Meeting with A. Merelles and S. Gonzalez (all KPMG) to discuss the additional dispositions depicted in the Dutch and Canadian Planning slide deck regarding the Mundipharma Disposition Analysis	0.5	\$ 730	\$ 365.00

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### EXHIBIT C1

### Purdue Pharma L.P. Case No. 19-23649

Name	Date	Description	Hours	Rate	Amount
Sara Gonzalez Perez	06/15/20	Meeting with R. Lijzenga and A. Merelles (all KPMG) to discuss the additional dispositions depicted in the Dutch and Canadian Planning slide deck regarding the Mundipharma Disposition Analysis	0.5	\$ 380	\$ 190.00
Alejandro Merelles Rodriguez	06/15/20	Meeting with R. Lijzenga and S. Gonzalez (all KPMG) to discuss the additional dispositions depicted in the Dutch and Canadian Planning slide deck regarding the Mundipharma Disposition Analysis	0.5	\$ 640	\$ 320.00
Devon Rowles	06/15/20	(0.7) Updating the document listing tracker to include information received in the virtual data room (VDR) as of 6/15/2020.	0.7	\$ 350	\$ 245.00
Sara Gonzalez Perez	06/15/20	Continue (from 6/11) to draft high-level potential Luxembourg tax comments on the additional dispositions depicted in the Dutch and Canadian Planning slide deck regarding the Mundipharma Disposition Analysis	0.9	\$ 380	\$ 342.00
Isaac Hirsch	06/15/20	(1.1) Performed Managing Director review of updated cash tax summary prepared in response to follow-up request from UCC and Purdue legal and financial advisors	1.1	\$ 819	\$ 900.90
Becky Holtje	06/15/20	(1.5) Continue, on same day, to perform research to facilitate cash tax modeling regarding timing of certain deductions	1.5	\$ 744	\$ 1,116.00
Devon Rowles	06/15/20	(1.7) Reviewed the virtual data room for tax relevant information received as of 6/15/2020 in order to notify the wider KPMG US team about tax relevant documents received	1.7	\$ 350	\$ 595.00
Emilien Lebas	06/15/20	Performed Partner review and concurrently revised the draft high-level potential Luxembourg tax comments on the Dutch & Canadian Planning slide deck regarding the Mundipharma Disposition Analysis	2.2	\$ 985	\$ 2,167.00
Jess Commisso	06/15/20	(2.8) Creation of tax attribute table within the cash tax model based on various disposition scenarios pursuant to client request.	2.8	\$ 350	\$ 980.00
Robin Lijzenga	06/15/20	Manager review and concurrently revise the draft high-level potential Luxembourg tax comments on the Dutch & Canadian Planning slide deck regarding the Mundipharma Disposition Analysis	3.2	\$ 730	\$ 2,336.00
Alejandro Merelles Rodriguez	06/15/20	Performed Senior Associate level review and concurrently revised the draft high-level potential Luxembourg tax comments on the Dutch & Canadian Planning slide deck regarding the Mundipharma Disposition Analysis	3.4	\$ 640	\$ 2,176.00
Becky Holtje	06/15/20	(3.9) Performed research, as of $6/15/2020$ , to facilitate cash tax modeling relating to timing of certain deductions	3.9	\$ 744	\$ 2,901.60

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### EXHIBIT C1

### Purdue Pharma L.P. Case No. 19-23649

Name	Date	Description	Hours	Rate	Amount
Devon Rowles	06/15/20	(3.9) Updating the Purdue cash tax model for a summary depicting certain tax attributes.	3.9	\$ 350	\$ 1,365.00
Casey Nunez	06/16/20	(0.3) Correspondence with Province regarding potential tax deductions.	0.3	\$ 744	\$ 223.20
Emilien Lebas	06/16/20	Partner review of final draft of the Dutch & Canadian Planning slide deck regarding the Mundipharma Disposition Analysis, prior to providing to KPMG U.S. team.	0.8	\$ 985	\$ 788.00
Robin Lijzenga	06/16/20	Performed manager review and concurrently amend the first draft of the Dutch & Canadian Planning slide deck regarding the Mundipharma Disposition Analysis, with respect to updates related to Partner review comments.	0.8	\$ 730	\$ 584.00
Ashley Armfield	06/16/20	(0.9) Discussion with I. Hirsch, A. Armfield, D. Rowles and J. Commisso (KPMG) regarding updates to potential deductions' effect on the cash tax model as of 6/16/2020.	0.9	\$ 534	\$ 480.60
Devon Rowles	06/16/20	(0.9) Discussion with I. Hirsch, A. Armfield, D. Rowles and J. Commisso (KPMG) regarding updates to potential deductions' effect on the cash tax model as of 6/16/2020.	0.9	\$ 350	\$ 315.00
Isaac Hirsch	06/16/20	(0.9) Discussion with I. Hirsch, A. Armfield, D. Rowles and J. Commisso (KPMG) regarding updates to potential deductions' effect on the cash tax model as of 6/16/2020.	0.9	\$ 819	\$ 737.10
Jess Commisso	06/16/20	(0.9) Discussion with I. Hirsch, A. Armfield, D. Rowles and J. Commisso (KPMG) regarding updates to potential deductions' effect on the cash tax model as of 6/16/2020.	0.9	\$ 350	\$ 315.00
Jonas Lau	06/16/20	Canadian Senior Manager review of KPMG US slide deck with regards to incorporation of Canadian planning alternatives	0.9	\$ 614	\$ 552.60
Isaac Hirsch	06/16/20	(1.1) Managing Director review of additional updates to cash tax summary prepared in response to follow-up request from UCC and Purdue legal and financial advisors	1.1	\$ 819	\$ 900.90
Sara Gonzalez Perez	06/16/20	Updated first draft of the Dutch & Canadian Planning slide deck regarding the Mundipharma Disposition Analysis based on review comments resulting from Partner review.	1.1	\$ 380	\$ 418.00
Casey Nunez	06/16/20	(1.2) Performed M&A Tax Senior Manager review of updates to cash tax model, as of 6/16/2020, for additional sensitivity analyses.	1.2	\$ 744	\$ 892.80
Alejandro Merelles Rodriguez	06/16/20	Perform Senior Associate level review and concurrently revised first draft of the Dutch & Canadian Planning slide deck regarding the Mundipharma Disposition Analysis with specific regards to updates related to Partner review comments.	2.1	\$ 640	\$ 1,344.00

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#### EXHIBIT C1

### Purdue Pharma L.P. Case No. 19-23649

Bankruptcy Tax Consulting Services June 1, 2020 through June 30, 2020

Name	Date	Description	Hours	Rate	Amount
Devon Rowles	06/16/20	(2.4) Continue (from prior day ) to update the Purdue cash tax model for a summary depicting certain tax attributes	2.4	\$ 350	\$ 840.00
Becky Holtje	06/16/20	(2.7) Perform research, as of 6/16/2020, to facilitate cash tax modeling relating to timing of certain deductions	2.7	\$ 744	\$ 2,008.80
Jess Commisso	06/17/20	(1.1) Updates to the cash tax model with regards to sensitivity analysis requests from the client.	1.1	\$ 350	\$ 385.00
Isaac Hirsch	06/17/20	(1.2) Managing Director review of additional updates to cash tax summary prepared in response to follow-up request from UCC and Purdue legal and financial advisors	1.2	\$ 819	\$ 982.80
Devon Rowles	06/17/20	(1.8) Update the Purdue cash tax model per review comments received from I. Hirsch (KPMG Managing Director) as of 6/17/2020 regarding certain potential deductions	1.8	\$ 350	\$ 630.00
Devon Rowles	06/17/20	(1.9) Updated the Purdue cash tax model per review comments received from I. Hirsch (KPMG Managing Director) as of 6/17/2020	1.9	\$ 350	\$ 665.00
Frankie Angeleri	06/18/20	(2.3) Associate preparation of summary of all entities functions in order to analyze the transfer policy	2.3	\$ 520	\$ 1,196.00
Molly Minnear	06/19/20	(0.2) Meeting with M. Minnear, K. Taylor and F. Angeleri (KPMG) to discuss next steps with regard to beginning the transfer pricing analysis.	0.2	\$ 868	\$ 173.60
Frankie Angeleri	06/19/20	(0.2) Meeting with M. Minnear, K. Taylor and F. Angeleri (KPMG) to discuss next steps with regard to beginning the transfer pricing analysis.	0.2	\$ 520	\$ 104.00
Kieran Taylor	06/19/20	(0.2) Meeting with M. Minnear, K. Taylor and F. Angeleri (KPMG) to discuss next steps with regard to beginning the transfer pricing analysis.	0.2	\$ 744	\$ 148.80
Frankie Angeleri	06/19/20	(0.8) Creating functional analysis of the entities with the given information in order to gain insight into the transfer pricing structure and transfer pricing policies in place	0.8	\$ 520	\$ 416.00
Ashley Armfield	06/22/20	(1.1) Reviewing request received by external counsel relating to cash tax modeling and sensitivity analysis to determine next steps.	1.1	\$ 534	\$ 587.40
Pete DiMatteo	06/22/20	Performed international tax manager review and concurrently revised slide deck depicting potential Canadian (1.1) and Dutch planning (1.0).	2.1	\$ 650	\$ 1,365.00
Isaac Hirsch	06/22/20	(2.2) Perform managing director review of updated sensitivity analysis as of 6/22/2020.	2.1	\$ 819	\$ 1,719.90
Casey Nunez	06/22/20	(2.3) Performed M&A Tax Senior Manager review of additional cash tax modeling scenarios to respond to requests for further detail.	2.3	\$ 744	\$ 1,711.20
Frankie Angeleri	06/22/20	(2.5) Began to prepare transfer pricing analysis memo	2.5	\$ 520	\$ 1,300.00

KPMG LLP Monthly Fee Statement

# **19-23649**-std **Doc 1928 Filed D8/D5/20 Entered D8/D5/20 12:43:39 Main Document Prg 373 off 1328**

### EXHIBIT C1

#### Purdue Pharma L.P. Case No. 19-23649

Bankruptcy Tax Consulting Services June 1, 2020 through June 30, 2020

Name	Date	Description	Hours	Rate	Amount
Devon Rowles	06/22/20	(3.6) Revised assigned portion of the Purdue cash tax model based on review comments received from A. Armfield (KPMG) as of 6/22/2020.	3.6	\$ 350	\$ 1,260.00
Jess Commisso	06/23/20	(1.1) Updated the Purdue sensitivity analysis deliverables per review comments received from I. Hirsch (KPMG Managing Director) as of 6/23/2020.	1.1	\$ 350	\$ 385.00
Devon Rowles	06/23/20	(1.4) Updates to the Purdue cash tax model for per review comments received from C. Nunez (KPMG Senior Manager) as of 6/23/2020.	1.4	\$ 350	\$ 490.00
Devon Rowles	06/23/20	(2.8) Updates to the Purdue cash tax model for per review comments received from I. Hirsch (KPMG Managing Director) as of 6/23/2020.	2.8	\$ 350	\$ 980.00
Isaac Hirsch	06/23/20	(2.2) Performed a managing director review of updated sensitivity analysis as of 6/23/2020 while concurrently drafting review comments; (1.7) Performed managing director review of planning slides for Dutch structure as of 6/23/2020 and concurrently draft review comments.	3.9	\$ 819	\$ 3,194.10
Casey Nunez	06/23/20	(2.8) Perform M&A Tax Senior Manager review of 4 modeling scenarios; (1.2) Performed M&A Tax Senior Manager review of updated summary deliverables as of 6/23/2020.	4.0	\$ 744	\$ 2,976.00
Casey Nunez	06/24/20	(0.4) Perform M&A Tax Senior Manager review of updates to information request list to respond to client request related to material open items as of 6/24/2020.	0.4	\$ 744	\$ 297.60
Kieran Taylor	06/24/20	(1.2) Senior Manager review of transfer pricing analysis memo.	1.2	\$ 744	\$ 892.80
Frankie Angeleri	06/24/20	(3.0) Continue, from 6/22, to prepare transfer pricing analysis memo	3.0	\$ 520	\$ 1,560.00
Isaac Hirsch	06/24/20	(2.2) Performed managing director review of updated sensitivity analysis as of 6/24/2020; (1.5) continue from 6/23) to perform managing director review of planning slides for Dutch structure	3.7	\$ 819	\$ 3,030.30
Frankie Angeleri	06/25/20	Meeting with M. Minnear (KPMG), K. Taylor (KPMG) and F. Angeleri (KPMG) to discuss the preliminary draft and structure of KPMG's draft transfer pricing summary memo.	0.4	\$ 520	\$ 208.00
Molly Minnear	06/25/20	Meeting with M. Minnear (KPMG), K. Taylor (KPMG) and F. Angeleri (KPMG) to discuss the preliminary draft and structure of KPMG's draft transfer pricing summary memo.	0.4	\$ 868	\$ 347.20
Kieran Taylor	06/25/20	Meeting with M. Minnear (KPMG), K. Taylor (KPMG) and F. Angeleri (KPMG) to discuss the preliminary draft and structure of KPMG's draft transfer pricing summary memo.	0.4	\$ 744	\$ 297.60

KPMG LLP Monthly Fee Statement

# **19-23649**-std **Doc 1928 Filed D8/D5/20 Entered D8/D5/20 12:43:39 Main Document Prg 324 of 1328**

### EXHIBIT C1

### Purdue Pharma L.P. Case No. 19-23649

Bankruptcy Tax Consulting Services June 1, 2020 through June 30, 2020

Name	Date	Description	Hours	Rate	Amount
Jess Commisso	06/25/20	0.8 Updates to sensitivity analysis deliverables per review comments received from I. Hirsch (KPMG managing director).	0.8	\$ 350	\$ 280.00
Casey Nunez	06/25/20	(1.3) Performed M&A Tax Senior Manager review of updated 25-page deliverable summarizing numerous aspects of the global cash tax model.	1.3	\$ 744	\$ 967.20
Isaac Hirsch	06/25/20		3.7	\$ 819	\$ 3,030.30
Frankie Angeleri	06/25/20	3.7 Continued (from 6/22) to prepare transfer pricing analysis memo	3.7	\$ 520	\$ 1,924.00
Casey Nunez	06/26/20	(0.8) Discussion with Davis Polk & Wardwell LLP and Akin Gump Strauss Hauer & Field LLP teams and M. Hoffenberg, I. Hirsch, C. Nunez and J. Commisso (all KPMG) regarding critical outstanding items and next steps needed to satisfy current assumptions and further Mundipharma analysis.	0.8	\$ 744	\$ 595.20
Isaac Hirsch	06/26/20	(0.8) Discussion with Davis Polk & Wardwell LLP and Akin Gump Strauss Hauer & Field LLP teams and M. Hoffenberg, I. Hirsch, C. Nunez and J. Commisso (all KPMG) regarding critical outstanding items and next steps needed to satisfy current assumptions and further Mundipharma analysis.	0.8	\$ 819	\$ 655.20
Jess Commisso	06/26/20	(0.8) Discussion with Davis Polk & Wardwell LLP and Akin Gump Strauss Hauer & Field LLP teams and M. Hoffenberg, I. Hirsch, C. Nunez and J. Commisso (all KPMG) regarding critical outstanding items and next steps needed to satisfy current assumptions and further Mundipharma analysis.	0.8	\$ 350	\$ 280.00
Mark Hoffenberg	06/26/20	(0.8) Discussion with Davis Polk & Wardwell LLP and Akin Gump Strauss Hauer & Field LLP teams and M. Hoffenberg, I. Hirsch, C. Nunez and J. Commisso (all KPMG) regarding critical outstanding items and next steps needed to satisfy current assumptions and further Mundipharma analysis.	0.8	\$ 980	\$ 784.00
Casey Nunez	06/26/20	(0.9) Review of outstanding items in connection with cash tax modeling as of 6/26/2020 - in preparation for upcoming call with client.	0.9	\$ 744	\$ 669.60
Isaac Hirsch	06/26/20	(0.3) Performed Managing director review of updated information request list as of 6/26/2020; (1.1) prepared for upcoming call with Purdue and UCC legal and financial advisors by reviewing most current version of the Purdue global cash tax model	1.4	\$ 819	\$ 1,146.60

KPMG LLP Monthly Fee Statement

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### EXHIBIT C1

### Purdue Pharma L.P. Case No. 19-23649

Name	Date	Description	Hours	Rate	Amount
Jess Commisso	06/26/20	1.7 Review of documentation provided by client in virtual data room to indicate relevance to engagement and share with the rest of the internal KPMG tax team.	1.7	\$ 350	\$ 595.00
		<b>Total Bankruptcy Tax Consulting Services</b>	326.3		\$ 197,404.60

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#### **EXHIBIT C2**

### Purdue Pharma L.P. Case No. 19-23649

Non -Working Travel Time June 1, 2020 through June 30, 2020

Name	Date	Description	Hours	Rate	Amount
no fees billed for these services in current month					
		Total Non-Working Travel Time			\$ -

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**EXHIBIT C3** 

Purdue Pharma L.P.
Case No. 19-23649
Retention Services
June 1, 2020 through June 30, 2020

Name	Date	Description	Hours	Rate	Amount
	no	fees billed for these services in current month			
		<b>Total Retention Services</b>	0.0		\$ -

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### **EXHIBIT C4**

### Purdue Pharma L.P. Case No. 19-23649

Fee Application Preparation Services June 1, 2020 through June 30, 2020

Name	Date	Description	Hours	Rate	A	Mount
Wendy Shaffer	06/01/20	(0.1) Drafted email to H. Steinberg KPMG regarding approval of Purdue April monthly fee statement; (0.2) Finalized PDF Purdue April fee statement; (0.1) send copy of same to M Plangman KPMG to request approval of same; (0.1) send email to counsel to request filing services of Purdue April monthly fee statement	0.5	\$ 202	\$	101.00
Wendy Shaffer	06/02/20	(0.1) Prepare email to send copy of KPMG's 4th monthly fee statement to UST and Fee Examiner once it is approved by counsel	0.1	\$ 202	\$	20.20
Wendy Shaffer	06/03/20	(0.2) Reviewed email from M. Pera (David Polk) regarding updates requested to Purdue Pharma 4th monthly fee statement and forward to M. Plangman and C. Nunez (both KPMG) for review; (1.0) Updates to Purdue Pharma April monthly fee statement exhibits per direction from M. Pera (Davis Polk); (0.5) Incorporated updates to Purdue Pharma 4th monthly performed by M. Land (KPMG) based on feedback received from Davis Polk	1.7	\$ 202	\$	343.40
Monica Plangman	06/05/20	(0.1) Review email and documents regarding M. Pera's (Davis Polk) revisions in Purdue monthly fee statement	0.1	\$ 264	\$	26.40
Wendy Shaffer	06/05/20	(0.1) Additional updates to Purdue Pharma April fee statement per direction from M. Pera (Davis Polk); (0.1) PDF final version of same and send revised version to counsel for filing.	0.2	\$ 202	\$	40.40
Wendy Shaffer	06/08/20	(0.6) Updated exhibit C1 of Purdue Pharma 5th monthly fee statement to include data received from KPMG member firm professionals as of 6/8/2020.	0.6	\$ 202	\$	121.20
Wendy Shaffer	06/14/20	(0.2) Reviewed Work in Progress report to confirm billable hours for Purdue as of 6/14.	0.2	\$ 202	\$	40.40
Wendy Shaffer	06/14/20	(0.2) Updates to Exhibit A of Purdue monthly fee statement exhibits to include additional team members including titles and corresponding rates.	0.2	\$ 202	\$	40.40
Wendy Shaffer	06/14/20	(0.2) Updates to Purdue May monthly fee statement to include data received from professionals as of 6/14/2020.	0.2	\$ 202	\$	40.40
Wendy Shaffer	06/15/20	(0.2) Began to create exhibits to be included in Purdue Pharma 2nd Interim application - copies of previously filed fee statements within the Interim period.	0.2	\$ 202	\$	40.40
Wendy Shaffer	06/15/20	(0.3) Created Purdue April fee statement in Excel to send to fee examiner and (0.1) send to M. Plangman (KPMG) for review.	0.4	\$ 202	\$	80.80
Wendy Shaffer	06/15/20	-	0.6	\$ 202	\$	121.20
Wendy Shaffer	06/15/20	(0.1) Drafted email to T. Nobis (Fee Examiner from BK Legal) to provide copy of KPMG's 4th monthly fee statement for review; 1.7 Updated exhibit C1 of Purdue May monthly fee statement to include data received from professionals as of 6/15/2020.	1.8	\$ 202	\$	363.60
Wendy Shaffer	06/16/20	(0.1) Drafted email to T. Nobis (KPMG) regarding timing to receive initial report related to KPMG's 1st Interim fee application in Purdue matter.	0.1	\$ 202	\$	20.20

# **19-23649**-std **Doc 1928 Filed D8/D5/20 Entered D8/D5/20 12:43:39 Main Document Prg 429 off 1328**

### **EXHIBIT C4**

#### Purdue Pharma L.P. Case No. 19-23649

Fee Application Preparation Services June 1, 2020 through June 30, 2020

Name	Date	Description	Hours	Rate	A	Amount
Wendy Shaffer	06/16/20	(1.5) Reviewing Purdue Fee Examiner initial report and begin to create spreadsheet to respond to fee examiner comments.	1.5	\$ 202	\$	303.00
Monica Plangman	06/17/20	Call with C. Nunez, S. Carlin and W. Shaffer (KPMG) regarding Fee Examiner's report and responses/findings.	0.8	\$ 264	\$	211.20
Wendy Shaffer	06/17/20	(0.1) Drafted email to provide copy of Purdue Pharma 4th monthly fee statement to US Trustee.	0.1	\$ 202	\$	20.20
Wendy Shaffer	06/17/20	(0.2) Review of Purdue work in progress report for June 1 - June 15 to confirm billable US hours as of 6/17/2020.	0.2	\$ 202	\$	40.40
Wendy Shaffer	06/17/20	(3.3) Multiple calls and emails with M. Plangman, S. Carlin and C. Nunez (all KPMG) regarding Fee examiner comments related to Purdue Pharma 1st Interim including providing direction to B. Defliese (KPMG) regarding consolidation of meeting info and identifying time submitted by professionals in future fee apps and corresponding updates to spreadsheet - in preparation to send to Fee Examiner for call on Friday.	3.30	\$ 202	\$	666.60
Wendy Shaffer	06/17/20	(3.5) Updates to exhibit C1 of Purdue May monthly fee statement to include data received from professionals as of 6/17/2020.	3.5	\$ 202	\$	707.00
Teresa Williams	06/17/20	Updated assigned portion of exhibit C1 of Purdue Pharma's 6th Monthly fee statement to include data received from professionals as of 6/17/20.	3.5	\$ 140	\$	490.00
Wendy Shaffer	06/18/20	(0.1) Review email communication from C. Nunez (KPMG) regarding response from H. Steinberg (KPMG Partner) related to initial report from fee examiner; (0.3) prepared Purdue May file to send to M. Land (KPMG) to perform updates based on previous communication from Davis Polk	0.4	\$ 202	\$	80.80
Monica Plangman	06/18/20	In order to prepare for call with Fee Examiner, gather pertinent data including updating file and transmit to S. Carlin (KPMG) for tomorrow's call.	0.5	\$ 264	\$	132.00
Wendy Shaffer	06/18/20	(0.8) Updated exhibit C1 of Purdue May monthly fee statement to include data received from professionals as of 6/18/2020.	0.8	\$ 202	\$	161.60
Monica Plangman	06/19/20	0.6 Continue to review responses/findings and update file; 0.1 transmit file to S. Carlin; 0.5 call with S. Carlin and Fee Examiner to review first monthly fee statement and report.	1.2	\$ 264	\$	316.80
Wendy Shaffer	06/21/20	Updates to Purdue May monthly per M. Land (KPMG) (0.3) and updates to same to include data received from professionals as of 6/21/2020 (1.1)	1.4	\$ 202	\$	282.80
Wendy Shaffer	06/22/20	0.1 Review of Proposed Order related to Purdue 1st Interim application including reductions from fee examiner and 0.1 draft response to M. Pera (Davis Polk) regarding approval of same.	0.2	\$ 202	\$	40.40
Wendy Shaffer	06/23/20	0.1 Drafted email to C. Nunez (KPMG) regarding status of Purdue May monthly fee statement and next steps to finalization.	0.5	\$ 202	\$	101.00
Monica Plangman	06/24/20	Associate director review of May fee statement and concurrently provide comments.	2.2	\$ 264	\$	580.80

# **19-23649**-std **Doc 1928 Filed D8/D5/20 Entered D8/D5/20 12:43:39 Main Document Prg/490** of 1328

#### **EXHIBIT C4**

#### Purdue Pharma L.P. Case No. 19-23649

Fee Application Preparation Services June 1, 2020 through June 30, 2020

Name	Date	Description	Hours	Rate	Aı	nount
Wendy Shaffer	06/25/20	0.1 Review and respond to email from C. MacDonald (Purdue) regarding request for information related to KPMG 3rd and 4th monthly fee statements; 1.6 Updates to Purdue monthly exhibits per M. Plangman (KPMG) and 0.1 send to team for review approval.	1.8	\$ 202	\$	363.60
Teresa Williams	06/25/20	Updated assigned portion of exhibit C1 of Purdue Pharma's 6th Monthly fee statement to include data received from professionals as of 6/25/20.	2.1	\$ 140	\$	294.00
Teresa Williams	06/26/20	(0.7) Updated assigned portion of exhibit C1 of Purdue Pharma's 6th Monthly fee statement to include data received from professionals as of 6/26/20.	0.7	\$ 140	\$	98.00
Wendy Shaffer	06/26/20	0.6 Finalized Updates to Purdue 5th monthly fee statement in preparation for Partner review; 0.1 drafted email to H. Steinberg (KPMG) to request approval / permission to apply signature of Purdue Pharma 5th monthly fee statement documents;	0.7	\$ 202	\$	141.40
Monica Plangman	06/29/20	Associate director approval of fee statement prior to approval.	0.1	\$ 264	\$	26.40
Wendy Shaffer	06/29/20	0.1 Drafted email to D. Consla (Davis Polk) to request filing and service of KPMG's 5th monthly fee statement in the Purdue Pharma bankruptcy matter; 0.2 Finalized (PDF) Purdue Pharma 5th monthly fee statement and 0.1 draft email to M. Plangman KPMG) to provide copy of same for final approval prior to filing: 0.4 Updated exhibit C1 of Purdue to include data received from professionals as of 6/29.	nd al		\$	161.60
Wendy Shaffer	06/30/20	0.1 Final updates to Purdue May fee statement and send to M. Pera (Davis Polk) for filing.	0.1	\$ 202	\$	20.20
		<b>Total Fee Application Preparation Services</b>	33.3		\$ 6	,639.80

# **19-23649**-std **Doc 1928 Filed D8/D5/20 Entered D8/D5/20 12:43:39 Main Document Prg/451.0ff1328**

#### **EXHIBIT D**

### Purdue Pharma L.P. Case No. 19-23649

Summary of Out of Pocket Expenses June 1, 2020 through June 30, 2020

Category	An	nount
Airfare	\$	-
Lodging	\$	-
Meals	\$	-
Ground Transportation	\$	-
Miscellaneous	\$	_
Total	\$	-

# **19-23649**-std **Doc 1928 Filed D8/D5/20 Entered D8/D5/20 12:43:39 Main Document Prg/452** off 1328

#### **EXHIBIT D1**

### Purdue Pharma L.P. Case No. 19-23649

Detail of Out of Pocket Expenses June 1, 2020 through June 30, 2020

Name	Date	Description	Amount
		Air Fare Subtotal	\$ -
		Lodging Subtotal	\$ -
		Meals Subtotal	\$ -
		<b>Total Ground Transportation</b>	\$ -
		Miscellaneous Subtotal	\$ -
		Total Out of Pocket Expenses	\$ -

19-23649-shl Doc 1921 Filed 11/11/20 Entered 11/11/20 17:40:39 Main Document Pg 47 of 128

### **Schedule 2**

### **19-23649**-std **Doc 1925 Filed 09/03/20 Entered 09/03/20 27:40:39 Main Document** PRG48 of 298

### UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

	•	
In re:	:	Chapter 11

PURDUE PHARMA L.P., et al., : Case No. 19-23649 (RDD)

Debtors.<sup>1</sup> : (Jointly Administered)

\_\_\_\_\_\_

# SEVENTH MONTHLY FEE STATEMENT OF KPMG LLP FOR COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED AS TAX CONSULTANT FOR THE DEBTORS AND THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR THE PERIOD FROM JULY 1, 2020 THROUGH JULY 31, 2020

Name of Applicant:	KPMG 1	LLP	
Authorized to Provide Professional Services to:		otors and the Official Committee of red Creditors	
Date of Retention:	February 24, 2020, nunc pro tunc to December 23, 2019		
Period for Which Compensation and Reimbursement is Sought:	July 1, 2020 through July 31, 2020		
Amount of Compensation Sought as Actual, Reasonable, and Necessary:	\$	234,078.90	
Less 20% Holdback:	\$	(46,815.78)	
Amount of Expense Reimbursement Sought as Actual, Reasonable, and Necessary:	\$	0.00	
Total Fees and Expenses Due:	\$	187,263.12	

The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

# **19-23649**-8td **Doc 1985 Filed D9/D8/20 Entered D9/D8/20 22:40:39 Main Document** P9g42 of 228

Dated: September 3, 2020

/s/ Howard Steinberg
Howard Steinberg
Partner, KPMG LLP
1350 Avenue of the Americas

New York, New York 10019

(212) 872-6562

### **19-23649**-හේ **Doc 1925** Filed 09/02/20 Entered 09/02/20 22:40:39 Main Document Pමුණ of 228

#### **EXHIBIT A**

### Purdue Pharma L.P. Case No. 19-23649

Summary Of Hours and Discounted Fees Incurred By Professional July 1, 2020 through July 31, 2020

Professional Person	Position & Department	Country of Origin	Total Billed Hours	rly Billing Rate	Co	Total ompensation
Anthony Minervini	Managing Director - Washington National Tax	US	16.0	\$ 893	\$	14,288.00
Aroen Rambhadjan	Partner - Tax	Netherlands	1.2	\$ 884	\$	1,060.80
Ashley Armfield	Senior Associate - M&A Tax	US	20.9	\$ 534	\$	11,160.60
Becky Holtje	Senior Manager - Washington National Tax	US	7.0	\$ 744	\$	5,208.00
Bela Unell	Senior Manager - Washington National Tax	US	3.1	\$ 744	\$	2,306.40
Carol Conjura	Partner - Washington National Tax	US	0.5	\$ 906	\$	453.00
Casey Nunez	Senior Manager - M&A Tax	US	23.6	\$ 744	\$	17,558.40
Devon Rowles	Associate - M&A Tax	US	26.0	\$ 350	\$	9,100.00
Diego Lipp	Senior Associate - Tax	Switzerland	0.6	\$ 430	\$	258.00
Douglas Holland	Principal - Washington National Tax	US	2.4	\$ 985	\$	2,364.00
Frankie Angeleri	Associate - Economic & Valuation Services	US	41.6	\$ 520	\$	21,632.00
Gabriela Baker	Senior Associate - International Tax	US	17.6	\$ 534	\$	9,398.40
Howard Steinberg	Partner - M&A Tax	US	8.6	\$ 856	\$	7,361.60
Isaac Hirsch	Managing Director - Int'l Tax	US	57.9	\$ 819	\$	47,420.10
Jess Commisso	Associate - M&A Tax	US	29.9	\$ 350	\$	10,465.00
Jim Tod	Partner - Washington National Tax	US	4.6	\$ 906	\$	4,167.60
Jonas Lau	Senior Manager - Tax	Canada	0.4	\$ 614	\$	245.60
Kieran Taylor	Senior Manager - Tax	US	6.8	\$ 744	\$	5,059.20
Lukas van der Veen	Manager - Tax	Netherlands	3.6	\$ 565	\$	2,034.00
Mark Hoffenberg	Principal - Washington National Tax	US	2.3	\$ 980	\$	2,254.00
Molly Minnear	Principal - Economic & Valuation Services	US	1.7	\$ 868	\$	1,475.60
Monica Plangman	Associate Director - Bankruptcy	US	4.9	\$ 264	\$	1,293.60
Pete DiMatteo	Manager - Int'l Tax	US	46.5	\$ 650	\$	30,225.00
Rob Keller	Managing Director - Washington National Tax	US	13.8	\$ 893	\$	12,323.40
Teresa Williams	Associate - Bankruptcy	US	3.1	\$ 140	\$	434.00
Tracy Stone	Principal - Washington National Tax	US	13.9	\$ 906	\$	12,593.40
Wendy Shaffer	Manager - Bankruptcy	US	9.6	\$ 202	\$	1,939.20
Subtotal of Hours and Dis	scounted Fees		368.1		\$	234,078.90
<b>Total Discounted Fees</b> Out of Pocket Expenses					<b>\$</b> \$	234,078.90
<b>Total Fees and Out of Poc</b>	eket Expenses				\$	234,078.90
Less Holdback Adjustment	<del>-</del>				\$	(46,815.78)
Net Requested Fees & Ou					\$	187,263.12

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**Blended Hourly Rate** 

\$

635.91

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#### **EXHIBIT B**

### Purdue Pharma L.P. Case No. 19-23649

Summary of Hours and Discounted Fees Incurred by Category July 1, 2020 through July 31, 2020

		Total	Total Fees Requested		
Category	Exhibit	Billed Hours			
Bankruptcy Tax Consulting Services	C1	349.0	\$	229,296.10	
Non -Working Travel Time	C2	0.0	\$	-	
Retention Services	C3	0.0	\$	-	
Fee Application Preparation Services	C4	19.1	\$	4,782.80	
Total		368.1	\$	234,078.90	

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#### EXHIBIT C1

#### Purdue Pharma L.P. Case No. 19-23649

Bankruptcy Tax Consulting Services July 1, 2020 through July 31, 2020

Name	Date	Description	Hours	Rate	Amount
Isaac Hirsch	07/06/20	(0.8) Performed Managing Director review of updated Dutch disposition planning deck as of 7/6/2020.	0.8	\$ 819	\$ 655.20
Isaac Hirsch	07/06/20	(0.9) Perform international tax Managing Director review of updated information request as of 7/6/2020.	0.9	\$ 819	\$ 737.10
Howard Steinberg	07/06/20	(1.0) Partner review of client deliverables for updated cash tax model regarding tax analysis of Mundipharma disposition.	1.0	\$ 856	\$ 856.00
Jess Commisso	07/06/20	(1.2) Review of most recent documentation provided by client as of 7/6/2020, to determine relevance / distribution to various KPMG project teams - to facilitate tax analysis.	1.2	\$ 350	\$ 420.00
Pete DiMatteo	07/06/20	(1.9) Performed International tax manager review and concurrently revised potential Canadian separation transactions to reflect additional US federal income tax considerations.	1.9	\$ 650	\$ 1,235.00
Isaac Hirsch	07/06/20	(2.0) Perform Managing Director review of updated Cash Tax Modeling Summary & Sensitivity Analysis as of 7/6/2020.	2.0	\$ 819	\$ 1,638.00
Pete DiMatteo	07/06/20	(2.3) Performed International tax manager review and concurrently revised the potential Dutch separation transactions to reflect additional US federal income tax considerations;	2.3	\$ 650	\$ 1,495.00
Howard Steinberg	07/08/20	(1.2) Performed Partner review of client deliverables regarding tax analysis of Mundipharma disposition.	1.2	\$ 856	\$ 1,027.20
Frankie Angeleri	07/07/20	(0.3) Meeting with K. Taylor and F. Angeleri (KPMG) to discuss comments and additions to the draft transfer pricing memo.	0.3	\$ 520	\$ 156.00
Kieran Taylor	07/07/20	(0.3) Meeting with K. Taylor and F. Angeleri (KPMG) to discuss comments and additions to the draft transfer pricing memo.	0.3	\$ 744	\$ 223.20
Casey Nunez	07/07/20	(0.4) Call with J. Dougherty (Haug Partners), M. Hoffenberg, I. Hirsch, and C. Nunez (KPMG) to discuss open KPMG information requests relating to U.S. Independent Associate companies (IAC).	0.4	\$ 744	\$ 297.60
Isaac Hirsch	07/07/20	(0.4) Call with J. Dougherty (Haug Partners), M. Hoffenberg, I. Hirsch, and C. Nunez (KPMG) to discuss open KPMG information requests relating to U.S. Independent Associate companies (IAC).	0.4	\$ 819	\$ 327.60
Mark Hoffenberg	07/07/20	(0.4) Call with J. Dougherty (Haug Partners), M. Hoffenberg, I. Hirsch, and C. Nunez (KPMG) to discuss open KPMG information requests relating to U.S. Independent Associate companies (IAC).	0.4	\$ 980	\$ 392.00
Howard Steinberg	07/07/20	(0.5) Performed Partner review of updated client deliverables regarding tax analysis of Mundipharma disposition.	0.5	\$ 856	\$ 428.00
Frankie Angeleri	07/07/20	(0.6) Continued, from earlier in the day, to address review comments on transfer pricing memo while concurrently adding more details related to Purdue business and transfer pricing policies	0.6	\$ 520	\$ 312.00
Pete DiMatteo	07/07/20	(1.2) Performed additional international tax manager review of updated version of slide deck depicting potential Dutch separation transactions and concurrently drafted review comments.	1.2	\$ 650	\$ 780.00

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#### EXHIBIT C1

### Purdue Pharma L.P. Case No. 19-23649

Name	Date	Description	Hours	Rate	Amount
Isaac Hirsch	07/07/20	(1.2) Prepare for call with Haug Partners by reviewing latest version of information request list.	1.2	\$ 819	\$ 982.80
Jess Commisso	07/07/20	(1.4) Review of most recent documentation provided by client as of 7/7/2020, to determine relevance (and distribution of same) to various KPMG project teams - to facilitate tax analysis.	1.4	\$ 350	\$ 490.00
Pete DiMatteo	07/07/20	(1.6) Perform additional International tax manager review of and concurrently revised updated version of slide deck depicting potential Canadian separation transactions;	1.6	\$ 650	\$ 1,040.00
Frankie Angeleri	07/07/20	(3.9) Addressed review comments from K. Taylor (KPMG) related to transfer pricing memo.	3.9	\$ 520	\$ 2,028.00
Diego Lipp	07/08/20	Drafted email D. Rowles (KPMG US) regarding new Swiss documents uploaded to the virtual data room.	0.3	\$ 430	\$ 129.00
Ashley Armfield	07/08/20	(0.3) Discussion with M. Hoffenberg, H. Steinberg, B. Unell, D. Holland, I. Hirsch, C. Nunez, A. Armfield, D. Rowles and J. Commisso (KPMG) regarding circulation of updated client deliverable and next steps related to overall engagement as of 7/8/2020.	0.3	\$ 534	\$ 160.20
Douglas Holland	07/08/20	(0.3) Discussion with M. Hoffenberg, H. Steinberg, B. Unell, D. Holland, I. Hirsch, C. Nunez, A. Armfield, D. Rowles and J. Commisso (KPMG) regarding circulation of updated client deliverable and next steps related to overall engagement as of 7/8/2020.	0.3	\$ 985	\$ 295.50
Bela Unell	07/08/20	(0.3) Discussion with M. Hoffenberg, H. Steinberg, B. Unell, D. Holland, I. Hirsch, C. Nunez, A. Armfield, D. Rowles and J. Commisso (KPMG) regarding circulation of updated client deliverable and next steps related to overall engagement as of 7/8/2020.	0.3	\$ 744	\$ 223.20
Jess Commisso	07/08/20	(0.3) Discussion with M. Hoffenberg, H. Steinberg, B. Unell, D. Holland, I. Hirsch, C. Nunez, A. Armfield, D. Rowles and J. Commisso (KPMG) regarding circulation of updated client deliverable and next steps related to overall engagement as of 7/8/2020.	0.3	\$ 350	\$ 105.00
Casey Nunez	07/08/20	(0.3) Discussion with M. Hoffenberg, H. Steinberg, B. Unell, D. Holland, I. Hirsch, C. Nunez, A. Armfield, D. Rowles and J. Commisso (KPMG) regarding circulation of updated client deliverable and next steps related to overall engagement as of 7/8/2020.	0.3	\$ 744	\$ 223.20
Howard Steinberg	07/08/20	(0.3) Discussion with M. Hoffenberg, H. Steinberg, B. Unell, D. Holland, I. Hirsch, C. Nunez, A. Armfield, D. Rowles and J. Commisso (KPMG) regarding circulation of updated client deliverable and next steps related to overall engagement as of 7/8/2020.	0.3	\$ 856	\$ 256.80
Mark Hoffenberg	07/08/20	(0.3) Discussion with M. Hoffenberg, H. Steinberg, B. Unell, D. Holland, I. Hirsch, C. Nunez, A. Armfield, D. Rowles and J. Commisso (KPMG) regarding circulation of updated client deliverable and next steps related to overall engagement as of 7/8/2020.	0.3	\$ 980	\$ 294.00

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#### EXHIBIT C1

### Purdue Pharma L.P. Case No. 19-23649

Bankruptcy Tax Consulting Services July 1, 2020 through July 31, 2020

Name	Date	Description	Hours	Rate	Amount
Isaac Hirsch	07/07/20	(0.3) Discussion with M. Hoffenberg, H. Steinberg, B. Unell, D. Holland, I. Hirsch, C. Nunez, A. Armfield, D. Rowles and J. Commisso (KPMG) regarding circulation of updated client deliverable and next steps related to overall engagement as of 7/8/2020.	0.3	\$ 819	\$ 245.70
Devon Rowles	07/08/20	(0.3) Discussion with M. Hoffenberg, H. Steinberg, B. Unell, D. Holland, I. Hirsch, C. Nunez, A. Armfield, D. Rowles and J. Commisso (KPMG) regarding circulation of updated client deliverable and next steps related to overall engagement as of 7/8/2020.	0.3	\$ 350	\$ 105.00
Frankie Angeleri	07/08/20	(0.6) Continue, from same day, to review and concurrently create a list of the relevant materials, data and information from the KPMG share site.	0.6	\$ 520	\$ 312.00
Rob Keller	07/08/20	(0.8) Conference call with T. Stone and R. Keller (KPMG) to further discuss/refine analysis regarding certain tax deductions.	0.8	\$ 893	\$ 714.40
Tracy Stone	07/08/20	(0.8) Conference call with T. Stone and R. Keller (KPMG) to further discuss/refine analysis regarding certain tax deductions.	0.8	\$ 906	\$ 724.80
Becky Holtje	07/08/20	(1.0) Perform research, as of 7/8/2020, to facilitate cash tax modeling regarding timing of certain deductions for taxpayers.	1.0	\$ 744	\$ 744.00
Jess Commisso	07/08/20	(1.6) Review of most recent documentation provided by client as of 7/8/2020, to determine relevance (and distribution of same) to various KPMG project teams - to facilitate tax analysis.	1.6	\$ 350	\$ 560.00
Isaac Hirsch	07/08/20	(2.1) Performed Managing Director review of updated Dutch disposition planning slides as of 7/8/2020.	2.1	\$ 819	\$ 1,719.90
Devon Rowles	07/08/20	(2.1) Updating the document listing tracker to include information received in the virtual data room (VDR) as of 7-8-2020.	2.1	\$ 350	\$ 735.00
Ashley Armfield	07/08/20	(1.3) Reviewing 2013 US tax filings pursuant to gain insight into client history; (1.1) Drafted summary of key findings of US tax filings to progress tax analysis.	2.4	\$ 534	\$ 1,281.60
Isaac Hirsch	07/08/20	(3.3) International Managing Director level analysis of US partnership tax returns for purposes of testing assumptions in cash tax model	3.3	\$ 819	\$ 2,702.70
Frankie Angeleri	07/08/20	(3.9) Continued (from previous day) to address review comments from K. Taylor (KPMG) related to transfer pricing memo.	3.9	\$ 520	\$ 2,028.00
Frankie Angeleri	07/08/20	(3.9) Review and concurrently create a list of the relevant materials, data and information from the KPMG share site.	3.9	\$ 520	\$ 2,028.00
Devon Rowles	07/08/20	(3.9) Performed a detailed review of documents received as of 7/8/2020 in order to notify the wider KPMG US Core team about relevant tax documents received.	3.9	\$ 350	\$ 1,365.00
Tracy Stone	07/09/20	(0.3) Performed Principal WNT analysis of origin of the claim case law in connection with fraudulent conveyance analysis.	0.3	\$ 906	\$ 271.80
Tracy Stone	07/09/20	(0.5) Principal WNT review of Purdue ownership structure in connection with fraudulent conveyance analysis.	0.5	\$ 906	\$ 453.00

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#### EXHIBIT C1

### Purdue Pharma L.P. Case No. 19-23649

Bankruptcy Tax Consulting Services July 1, 2020 through July 31, 2020

Name	Date	Description	Hours	Rate	Amount
Tracy Stone	07/09/20	(0.5) Performed Principal WNT review of trust characteristics in connection with fraudulent conveyance analysis.	0.5	\$ 906	\$ 453.00
Tracy Stone	07/09/20	(0.7) Perform Principal WNT Review Purdue term sheet in connection with direct liability analysis.	0.7	\$ 906	\$ 634.20
Isaac Hirsch	07/09/20	(0.8) Perform Managing director review of updated Canadian disposition planning slides as of $7/9/2020.$	0.8	\$ 819	\$ 655.20
Becky Holtje	07/09/20	Discussion with J. Tod (US National Tax expert on Passthroughs), B. Unell (US National expert on Restructuring), T. Stone (US National Tax expert on Trusts) - partial attendance, R. Keller (US National Tax expert on Passthroughs) - partial attendance, B. Holtje (US National Tax - Restructuring Specialist) - partial attendance, I. Hirsch, C. Nunez and P. DiMatteo (KPMG) regarding various issues relating to distributions made by Purdue and certain tax deductions.	1.0	\$ 744	\$ 744.00
Rob Keller	07/09/20	Discussion with J. Tod (US National Tax expert on Passthroughs), B. Unell (US National expert on Restructuring), T. Stone (US National Tax expert on Trusts) - partial attendance, R. Keller (US National Tax expert on Passthroughs) - partial attendance, B. Holtje (US National Tax - Restructuring Specialist) - partial attendance, I. Hirsch, C. Nunez and P. DiMatteo (KPMG) regarding various issues relating to distributions made by Purdue and certain tax deductions.	1.0	\$ 893	\$ 893.00
Tracy Stone	07/09/20	Discussion with J. Tod (US National Tax expert on Passthroughs), B. Unell (US National expert on Restructuring), T. Stone (US National Tax expert on Trusts) - partial attendance, R. Keller (US National Tax expert on Passthroughs) - partial attendance, B. Holtje (US National Tax - Restructuring Specialist) - partial attendance, I. Hirsch, C. Nunez and P. DiMatteo (KPMG) regarding various issues relating to distributions made by Purdue and certain tax deductions.	1.0	\$ 906	\$ 906.00
Bela Unell	07/09/20	Discussion with J. Tod (US National Tax expert on Passthroughs), B. Unell (US National expert on Restructuring), T. Stone (US National Tax expert on Trusts) - partial attendance, R. Keller (US National Tax expert on Passthroughs) - partial attendance, B. Holtje (US National Tax - Restructuring Specialist) - partial attendance, I. Hirsch, C. Nunez and P. DiMatteo (KPMG) regarding various issues relating to distributions made by Purdue and certain tax deductions.	1.1	\$ 744	\$ 818.40
Casey Nunez	07/09/20	Discussion with J. Tod (US National Tax expert on Passthroughs), B. Unell (US National expert on Restructuring), T. Stone (US National Tax expert on Trusts) - partial attendance, R. Keller (US National Tax expert on Passthroughs) - partial attendance, B. Holtje (US National Tax - Restructuring Specialist) - partial attendance, I. Hirsch, C. Nunez and P. DiMatteo (KPMG) regarding various issues relating to distributions made by Purdue and certain tax deductions.	1.1	\$ 744	\$ 818.40

KPMG LLP Monthly Fee Statement

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#### EXHIBIT C1

#### Purdue Pharma L.P. Case No. 19-23649

Name	Date	Description	Hours	Rate	1	Amount
Isaac Hirsch	07/09/20	Discussion with J. Tod (US National Tax expert on Passthroughs), B. Unell (US National expert on Restructuring), T. Stone (US National Tax expert on Trusts) - partial attendance, R. Keller (US National Tax expert on Passthroughs) - partial attendance, B. Holtje (US National Tax - Restructuring Specialist) - partial attendance, I. Hirsch, C. Nunez and P. DiMatteo (KPMG) regarding various issues relating to distributions made by Purdue and certain tax deductions.	1.1	\$ 819	\$	900.90
Jim Tod	07/09/20	Discussion with J. Tod (US National Tax expert on Passthroughs), B. Unell (US National expert on Restructuring), T. Stone (US National Tax expert on Trusts) - partial attendance, R. Keller (US National Tax expert on Passthroughs) - partial attendance, B. Holtje (US National Tax - Restructuring Specialist) - partial attendance, I. Hirsch, C. Nunez and P. DiMatteo (KPMG) regarding various issues relating to distributions made by Purdue and certain tax deductions.	1.1	\$ 906	\$	996.60
Pete DiMatteo	07/09/20	Discussion with J. Tod (US National Tax expert on Passthroughs), B. Unell (US National expert on Restructuring), T. Stone (US National Tax expert on Trusts) - partial attendance, R. Keller (US National Tax expert on Passthroughs) - partial attendance, B. Holtje (US National Tax - Restructuring Specialist) - partial attendance, I. Hirsch, C. Nunez and P. DiMatteo (KPMG) regarding various issues relating to distributions made by Purdue and certain tax deductions.	1.1	\$ 650	\$	715.00
Rob Keller	07/09/20	(1.5) Performed analysis related to results of discussion with broader KPMG team regarding Purdue trusts.	1.5	\$ 893	\$	1,339.50
Tracy Stone	07/09/20	(1.5) Analysis of certain timing considerations for tax deductions.	1.5	\$ 906	\$	1,359.00
Isaac Hirsch	07/09/20	(1.8) Analysis of cash tax model assumptions for testing of same by review of tax return information.	1.8	\$ 819	\$	1,474.20
Ashley Armfield	07/09/20	(1.8) Reviewing updated information request list with regards to new information received as of 7/9/2020.	1.8	\$ 534	\$	961.20
Pete DiMatteo	07/09/20	(1.9) Perform international tax manager review of assumptions made with respect to global cash tax model against tax return information provided as of 7/9/2020.	1.9	\$ 650	\$	1,235.00
Devon Rowles	07/09/20	(1.9) Updates to the Purdue cash tax model with regards to review comments received from senior associate (A. Armfield) as of 7/9/2020.	1.9	\$ 350	\$	665.00
Gabriela Baker	07/09/20	(2.0) Review of US tax filings for two US partnerships.	2.0	\$ 534	\$	1,068.00
Frankie Angeleri	07/09/20	(2.0) Creating transaction flow of all entities, including their intercompany transactions.	2.0	\$ 520	\$	1,040.00
Pete DiMatteo	07/09/20	(2.1) Perform international tax manager review of US tax filings for US partnership.	2.1	\$ 650	\$	1,365.00
Jess Commisso	07/09/20	(2.3) Continue, same day, to review US tax filings provided by client to analyze what information can be incorporated into our cash tax model and to see which US tax filings are still outstanding.	2.3	\$ 350	\$	805.00

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#### EXHIBIT C1

#### Purdue Pharma L.P. Case No. 19-23649

Name	Date	Description	Hours	Rate	Amount
Isaac Hirsch	07/09/20	(2.3) Performed analysis of US partnership tax returns for purposes of testing assumptions in cash tax model	2.3	\$ 819	\$ 1,883.70
Ashley Armfield	07/09/20	(1.3) Review of 2017 US partnership tax filing to gaining insight into client history, (1.2) Review of 2018 US partnership tax filing pursuant to gaining insight into client history.	2.5	\$ 534	\$ 1,335.00
Ashley Armfield	07/09/20	(1.1) Review of 2014 US tax filing to gaining insight into client history, (1.4) Review of 2015 US tax filing pursuant to gaining insight into client history, (0.9) Review of 2016 US tax filing pursuant to gaining insight into client history.	3.4	\$ 534	\$ 1,815.60
Jess Commisso	07/09/20	(3.9) Review of US tax filings provided by client to analyze what information can be incorporated into our cash tax model / which US tax filings are still outstanding.	3.9	\$ 350	\$ 1,365.00
Frankie Angeleri	07/10/20	Meeting with M. Minnear (KPMG), K. Taylor (KPMG) and F. Angeleri (KPMG) to discuss the preliminary draft and structure of KPMG's internal transfer pricing summary memo as well as next steps.	0.3	\$ 520	\$ 156.00
Kieran Taylor	07/10/20	Meeting with M. Minnear (KPMG), K. Taylor (KPMG) and F. Angeleri (KPMG) to discuss the preliminary draft and structure of KPMG's internal transfer pricing summary memo as well as next steps.	0.3	\$ 744	\$ 223.20
Molly Minnear	07/10/20	Meeting with M. Minnear (KPMG), K. Taylor (KPMG) and F. Angeleri (KPMG) to discuss the preliminary draft and structure of KPMG's internal transfer pricing summary memo as well as next steps.	0.3	\$ 868	\$ 260.40
Anthony Minervini	07/10/20	Discussion with J. Tod and A. Minervini (both KPMG) regarding research related to certain tax deductions.	0.5	\$ 893	\$ 446.50
Jim Tod	07/10/20	Discussion with J. Tod and A. Minervini (both KPMG) regarding research related to certain tax deductions.	0.5	\$ 906	\$ 453.00
Howard Steinberg	07/10/20	Performed Partner review of updated assumptions included in latest Purdue tax analysis with regards to Mundipharma disposition.	1.0	\$ 856	\$ 856.00
Isaac Hirsch	07/10/20	(1.2) Managing director review of analysis of plan for testing cash tax modeling assumptions using tax return information.	1.2	\$ 819	\$ 982.80
Jess Commisso	07/10/20	Updates to the Purdue cash tax model with regards to review comments received from A. Armfield (KPMG).	2.4	\$ 350	\$ 840.00
Pete DiMatteo	07/10/20	(2.6) Performed additional international tax manager review of global cash tax model assumptions against tax return information provided this week.	2.6	\$ 650	\$ 1,690.00
Isaac Hirsch	07/10/20	(2.6) Performed Managing director review of updated cash tax model as of 7/10/2020.	2.6	\$ 819	\$ 2,129.40
Devon Rowles	07/10/20	(2.8) Updating the cash tax model with regards to senior associate (A. Armfield) review comments received as of 6/10/2020.	2.8	\$ 350	\$ 980.00

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#### EXHIBIT C1

### Purdue Pharma L.P. Case No. 19-23649

Name	Date	Description	Hours	Rate	Amount
Diego Lipp	07/13/20	Review of new Swiss documents uploaded to the virtual data room as of 7/13/2020 and simultaneously draft e-mail to D. Rowles (KPMG US) regarding relevant key findings.	0.3	\$ 430	\$ 129.00
Anthony Minervini	07/13/20	Additional meeting with J. Tod (KPMG) to discuss research related to certain tax deductions.	0.6	\$ 893	\$ 535.80
Jim Tod	07/13/20	Additional meeting with A. Minervini (KPMG) to discuss research related to certain tax deductions.	0.6	\$ 906	\$ 543.60
Pete DiMatteo	07/13/20	Continued, same day, to perform international tax manager review of assumptions related to global cash tax model (0.4). Begin draft of additional information requests for information necessary to test assumptions (0.8)	1.2	\$ 650	\$ 780.00
Devon Rowles	07/13/20	1.4 Performed a detailed review of client tax documents received as of 7-13-2020 in order to notify the wider KPMG US team about relevant tax documents received that could impact various disposition scenarios in the cash tax model	1.4	\$ 350	\$ 490.00
Kieran Taylor	07/13/20	Collated transfer pricing summary schedule used to document Purdue's existing transfer pricing arrangements.	1.8	\$ 744	\$ 1,339.20
Casey Nunez	07/13/20	(2.3) Performed M&A Tax Senior Manager review of updated cash tax model assumptions for purposes of identifying any potentially material gaps in missing information	2.3	\$ 744	\$ 1,711.20
Rob Keller	07/13/20	Performed research, as discussed with A. Minervini (KPMG), related to certain tax deductions.	2.3	\$ 893	\$ 2,053.90
Pete DiMatteo	07/13/20	International tax manager review of assumptions related to global cash tax model (1.4). Begin to draft additional information requests for information necessary to test assumptions (1.2).	2.6	\$ 650	\$ 1,690.00
Isaac Hirsch	07/13/20	(2.2) Managing director review of updates to cash tax cost model; (0.9) perform managing director review of Dutch tax planning for purposes of determining potential cash tax effect of proposed transactions; (0.8) performed managing director review of schedule of potential overall foreign loss accounts for purposes of updating cash tax model with same	3.9	\$ 819	\$ 3,194.10
Anthony Minervini	07/13/20	Per request from J. Tod (KPMG), performed research relating to certain tax deductions.	2.9	\$ 893	\$ 2,589.70
Anthony Minervini	07/13/20	Per request from J. Tod (KPMG), performed additional research relating to certain tax deductions.	2.3	\$ 893	\$ 2,053.90
Anthony Minervini	07/13/20	Per request from J. Tod (KPMG), continued from same day, to perform additional research relating to certain tax deductions.	1.8	\$ 893	\$ 1,607.40
Anthony Minervini	07/13/20	Drafting summary of research and analysis performed relating to certain tax deductions.	0.7	\$ 893	\$ 625.10
Jonas Lau	07/14/20	Drafted email response to KPMG US questions regarding potential Canadian tax planning for the potential disposition of Canadian entity.	0.4	\$ 614	\$ 245.60

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#### EXHIBIT C1

### Purdue Pharma L.P. Case No. 19-23649

Name	Date	Description	Hours	Rate	Amount
Gabriela Baker	07/14/20	Call with P. DiMatteo and G. Baker (both KPMG) to discuss the Partnership Undistributed Income Analysis for Purdue foreign entities.	0.6	\$ 534	\$ 320.40
Pete DiMatteo	07/14/20	Call with P. DiMatteo and G. Baker (both KPMG) to discuss the Partnership Undistributed Income Analysis for Purdue foreign entities.	0.6	\$ 650	\$ 390.00
Gabriela Baker	07/14/20	Call with P. DiMatteo and G. Baker (both KPMG) to discuss background of Purdue entities related to Partnership Undistributed Income Analysis.	1.4	\$ 534	\$ 747.60
Pete DiMatteo	07/14/20	Call with P. DiMatteo and G. Baker (both KPMG) to discuss background of Purdue entities related to Partnership Undistributed Income Analysis.	1.4	\$ 650	\$ 910.00
Gabriela Baker	07/14/20	Perform partnership undistributed income analysis for Purdue domestic partnership and foreign trusts.	1.3	\$ 534	\$ 694.20
Jess Commisso	07/14/20	1.8 Review of US tax filings provided by client, as of 7/14/2020, to determine which US tax filings are still outstanding that are needed to further analyze our trust analysis.	1.8	\$ 350	\$ 630.00
Pete DiMatteo	07/14/20	2.7 Performed international tax manager review of various tax filings of certain Purdue entities in an effort to test assumptions made with respect to the global cash tax model.	2.7	\$ 650	\$ 1,755.00
Anthony Minervini	07/14/20	Continue from 7/13/20, drafting summary of research and analysis performed relating to certain tax deductions.	2.7	\$ 893	\$ 2,411.10
Isaac Hirsch	07/14/20	(2.4) Updates to cash tax model to include potential effects of overall foreign loss accounts for purposes of determining the cash tax effects of same	2.4	\$ 819	\$ 1,965.60
Lukas van der Veen	07/15/20	Review the potential impact of a legislative proposal on the potential disposition of Dutch entities, specifically with respect to dividend withholding tax.	0.9	\$ 565	\$ 508.50
Lukas van der Veen	07/15/20	Draft e-mail to KPMG US on the potential impact of a legislative proposal on the potential disposition of Dutch entities, specifically with respect to dividend withholding tax.	1.0	\$ 565	\$ 565.00
Aroen Rambhadjan	07/15/20	Partner review and concurrent updating of e-mail drafted by L. van der Veen (KPMG Netherlands) regarding the potential impact of a legislative proposal on the potential disposition of Dutch entities, specifically with respect to dividend withholding tax.	0.8	\$ 884	\$ 707.20
Jim Tod	07/15/20	Partner review of research relating to certain tax deductions.	0.6	\$ 906	\$ 543.60
Pete DiMatteo	07/15/20	0.8 Perform international tax manager review of research prepared by KPMG professionals relating to certain tax deductions.	0.8	\$ 650	\$ 520.00
Gabriela Baker	07/15/20	0.9 Phone conference between P. DiMatteo and G. Baker (both KPMG) to discuss the Purdue's partnerships' undistributed income analysis and additional information required for basis analysis of non-US entities.	0.9	\$ 534	\$ 480.60

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#### EXHIBIT C1

### Purdue Pharma L.P. Case No. 19-23649

Name	Date	Description	Hours	Rate	Amount
Pete DiMatteo	07/15/20	0.9 Phone conference between P. DiMatteo and G. Baker (both KPMG) to discuss the Purdue's partnerships' undistributed income analysis and additional information request in order to obtain additional information required for basis analysis of non-US entities.	0.9	\$ 650	\$ 585.00
Pete DiMatteo	07/15/20	1.1 Performed international tax manager review of information received and drafting of request of additional information for purposes of testing assumptions made in connection with the global cash tax model.	1.1	\$ 650	\$ 715.00
Howard Steinberg	07/15/20	Partner review of updated information request list as provided by I. Hirsch (KPMG) for cash tax modeling assumption testing.	1.5	\$ 856	\$ 1,284.00
Gabriela Baker	07/15/20	Performed Partnership Undistributed Income Analysis for foreign entities.	1.7	\$ 534	\$ 907.80
Isaac Hirsch	07/15/20	(1.2) Performed managing director review of updated information request list for cash tax model assumption testing; (0.8) managing director review of Washington National Tax analysis for purposes of including same in cash tax model	2.0	\$ 819	\$ 1,638.00
Kieran Taylor	07/15/20	Revision of transfer pricing analysis pursuant to receipt of transfer pricing reports as of 7/15/2020.	2.1	\$ 744	\$ 1,562.40
Frankie Angeleri	07/15/20	2.6 Reviewing transfer pricing reports on the share site.	2.6	\$ 520	\$ 1,352.00
Lukas van der Veen	07/16/20	(Continued from previous day) Finalize draft e-mail on the potential impact of a legislative proposal on the potential disposition of Dutch entities, specifically with respect to dividend withholding tax.	0.2	\$ 565	\$ 113.00
Lukas van der Veen	07/16/20	Draft follow-up email response to P. DiMatteo (KPMG US) regarding the potential impact of legislative proposal on the Dutch dividend withholding tax.	0.5	\$ 565	\$ 282.50
Isaac Hirsch	07/16/20	0.9 Conference call between I. Hirsch, P. DiMatteo, J. Commisso, and D. Rowles (all KPMG) to discuss the Purdue cash tax model assumptions, specifically related to the value allocation of each disposition entity	0.9	\$ 819	\$ 737.10
Pete DiMatteo	07/16/20	0.9 Conference call between I. Hirsch, P. DiMatteo, J. Commisso, and D. Rowles (all KPMG) to discuss the Purdue cash tax model assumptions, specifically related to the value allocation of each disposition entity	0.9	\$ 650	\$ 585.00
Devon Rowles	07/16/20	0.9 Conference call between I. Hirsch, P. DiMatteo, J. Commisso, and D. Rowles (all KPMG) to discuss the Purdue cash tax model assumptions, specifically related to the value allocation of each disposition entity	0.9	\$ 350	\$ 315.00
Jess Commisso	07/16/20	0.9 Conference call between I. Hirsch, P. DiMatteo, J. Commisso, and D. Rowles (all KPMG) to discuss the Purdue cash tax model assumptions, specifically related to the value allocation of each disposition entity	0.9	\$ 350	\$ 315.00
Pete DiMatteo	07/16/20	1.6 Perform international tax manager review of proposed Dutch planning in light of recent Dutch tax legislative proposals.	1.6	\$ 650	\$ 1,040.00

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#### EXHIBIT C1

### Purdue Pharma L.P. Case No. 19-23649

Name	Date	Description	Hours	Rate	Amount
Jess Commisso	07/16/20	1.6 Performed analysis of tax filings and financial statements of subsidiaries of disposition entities to determine additional tax exposure.	1.6	\$ 350	\$ 560.00
Pete DiMatteo	07/16/20	2.2 Review proposed transactions in connection with testing certain assumptions made for purposes of the global cash tax model;	2.2	\$ 650	\$ 1,430.00
Frankie Angeleri	07/16/20	Reviewing transfer pricing report documentation provided by client.	2.8	\$ 520	\$ 1,456.00
Devon Rowles	07/16/20	3.1 Performed a detailed review of tax documentation received as of 7-16-2020 in order to notify the wider KPMG team about relevant tax documents received.	3.1	\$ 350	\$ 1,085.00
Isaac Hirsch	07/16/20	(3.1) Additional updates to cash tax model to include potential effects of overall foreign loss accounts for purposes of determining the cash tax effects of same; (0.8) performed analysis of potential effects on cash tax modeling of allocations of value to lower-tier subsidiaries	3.9	\$ 819	\$ 3,194.10
Frankie Angeleri	07/17/20	Call between K. Taylor (KPMG) and F. Angeleri (KPMG) to discuss the approach to the profit and loss model for all Purdue entities.	0.1	\$ 520	\$ 52.00
Kieran Taylor	07/17/20	Call between K. Taylor (KPMG) and F. Angeleri (KPMG) to discuss the approach to the profit and loss model for all Purdue entities.	0.1	\$ 744	\$ 74.40
Frankie Angeleri	07/17/20	0.6 Review of information on the information provided by client, as of 7/1/2020; 0.6 Adding additional information to transfer pricing preliminary draft memo to organize functions / transfer pricing policies of the entities.	1.2	\$ 520	\$ 624.00
Gabriela Baker	07/17/20	Performed Partnership Undistributed Income Analysis for various entities to determine potential undistributed losses.	1.3	\$ 534	\$ 694.20
Casey Nunez	07/17/20	Testing of assumptions in cash tax model to evaluate potential for material differences in results	1.6	\$ 744	\$ 1,190.40
Pete DiMatteo	07/17/20	2.9 Performed international tax manager review of information provided (e.g., local tax returns and financial statements) to test various assumptions made in connection with global cash tax model;	2.9	\$ 650	\$ 1,885.00
Jess Commisso	07/17/20	3.2 Performed analysis of tax filings / financial statements of subsidiaries of disposition entities to determine additional tax exposure.	3.2	\$ 350	\$ 1,120.00
Isaac Hirsch	07/20/20	(0.6) Perform managing director review of updates to Dutch tax planning slides with respect to new proposed Dutch legislation	0.6	\$ 819	\$ 491.40
Ashley Armfield	07/20/20	0.7 Meeting with A. Armfield and D. Rowles (KPMG) to discuss updates that need to be made to Purdue cash tax modeling with regards to the inclusion of overall foreign losses.	0.7	\$ 534	\$ 373.80
Devon Rowles	07/20/20	0.7 Meeting with A. Armfield and D. Rowles (KPMG) to discuss updates that need to be made to Purdue cash tax modeling with regards to the inclusion of overall foreign losses.	0.7	\$ 350	\$ 245.00
Pete DiMatteo	07/20/20	1.2 Perform international tax manager review of relevant structures for purposes of determine potential effects of valuation changes;	1.2	\$ 650	\$ 780.00

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#### EXHIBIT C1

#### Purdue Pharma L.P. Case No. 19-23649

Name	Date	Description	Hours	Rate	Amount
Jess Commisso	07/20/20	Continued, from earlier in the day, to perform analysis of tax filings / financial statements of subsidiaries of disposition entities.	1.2	\$ 350	\$ 420.00
Becky Holtje	07/20/20	1.5 Performed research, as of 7/20, to facilitate cash tax modeling regarding timing of certain deductions.	1.5	\$ 744	\$ 1,116.00
Devon Rowles	07/20/20	2.9 Updating Purdue cash tax model with regards to review comments received from KPMG managing director (I. Hirsch) as of 7/20/2020.	2.9	\$ 350	\$ 1,015.00
Ashley Armfield	07/20/20	0.6 Review of managing director (I. Hirsch) comments relating to cash tax modeling and the inclusion of overall foreign losses. 2.8 Senior Associate review of updated cash tax model provided by staff relating to updates for overall foreign loss inclusions.	3.4	\$ 534	\$ 1,815.60
Gabriela Baker	07/20/20	Began to perform analysis as well as related calculations of certain income of foreign entities.	3.9	\$ 534	\$ 2,082.60
Gabriela Baker	07/20/20	Continue, same day, to perform analysis as well as related calculations of certain income of foreign entities.	1.6	\$ 534	\$ 854.40
Aroen Rambhadjan	07/20/20	Partner review of draft e-mail for KPMG US prepared by L. van der Veen (KPMG Netherlands) regarding potential Dutch tax planning for potential disposition of Dutch entities.	0.3	\$ 884	\$ 265.20
Lukas van der Veen	07/20/20	Draft follow-up e-mail for KPMG US regarding potential tax planning for the potential disposition of Dutch entities.	0.5	\$ 565	\$ 282.50
Lukas van der Veen	07/21/20	Follow-up draft e-mail response to I. Hirsch (KPMG US) regarding potential tax planning for the potential disposition of Dutch entities.	0.5	\$ 565	\$ 282.50
Aroen Rambhadjan	07/21/20	Partner review of draft follow-up e-mail prepared by L. van der Veen (KPMG Netherlands) sent to I. Hirsch (KPMG US). E-mail related to potential Dutch tax planning.	0.1	\$ 884	\$ 88.40
Pete DiMatteo	07/21/20	Performed International tax manager review (0.2) and related correspondence to KPMG UK tax team (0.4) regarding relevant structures for purposes of determine potential effects of valuation changes;	0.6	\$ 650	\$ 390.00
Kieran Taylor	07/21/20	Review of Purdue transfer pricing.	1.4	\$ 744	\$ 1,041.60
Casey Nunez	07/21/20	(1.8) Perform M&A Tax Senior Manager review of analysis of potential tax deductions.	1.8	\$ 744	\$ 1,339.20
Ashley Armfield	07/21/20	2.3 Review of ownership structure of Purdue entities in order to provide information to KPMG partnership tax specialists.	2.3	\$ 534	\$ 1,228.20
Jess Commisso	07/21/20	3.2 Analysis of partners of Purdue entities to support determination of allowable deductions.	3.2	\$ 350	\$ 1,120.00
Isaac Hirsch	07/21/20	(3.1) Performed managing director review of updates to cash tax model to incorporate overall foreign loss account effect.	3.1	\$ 819	\$ 2,538.90
Isaac Hirsch	07/21/20	(0.9) Performed Managing director review of analysis of value push- down to lower tier subsidiaries for purposes of cash tax modeling; (0.7) performed analysis related to certain potential deductions.	1.6	\$ 819	\$ 1,310.40

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#### EXHIBIT C1

### Purdue Pharma L.P. Case No. 19-23649

Name	Date	Description	Hours	Rate	Amount
Frankie Angeleri	07/22/20	0.2 Meeting with K. Taylor (KPMG) and F. Angeleri (KPMG) to discuss progress on Profit and Loss model, preliminary draft transfer pricing memo and next steps as of 7/22/2020.	0.2	\$ 520	\$ 104.00
Kieran Taylor	07/22/20	0.2 Meeting with K. Taylor (KPMG) and F. Angeleri (KPMG) to discuss progress on Profit and Loss model, preliminary draft transfer pricing memo and next steps as of 7/22/2020.	0.2	\$ 744	\$ 148.80
Gabriela Baker	07/22/20	Phone conference between P. DiMatteo and G. Baker (both KPMG) to discuss the undistributed earnings analysis of certain foreign trusts.	0.5	\$ 534	\$ 267.00
Pete DiMatteo	07/22/20	Phone conference between P. DiMatteo and G. Baker (both KPMG) to discuss the undistributed earnings analysis of certain foreign trusts.	0.5	\$ 650	\$ 325.00
Bela Unell	07/22/20	(.6) Performed WNT Director review of technical summaries to be provided to income tax accounting experts in anticipation of technical call.	0.6	\$ 744	\$ 446.40
Douglas Holland	07/22/20	Perform WNT review of tax comments as well as revisions to client deliverable planning alternatives structure deck.	1.0	\$ 985	\$ 985.00
Molly Minnear	07/22/20	Performed Principal Economic and Valuation Services review of draft deliverables prepared by team to prepare for upcoming discussion on next steps in analysis.	1.2	\$ 868	\$ 1,041.60
Frankie Angeleri	07/22/20	1.7 Updating preliminary transfer pricing draft memo based on results of discussion with K. Taylor (KPMG).	1.7	\$ 520	\$ 884.00
Casey Nunez	07/22/20	(1.9) Performed M&A Tax Senior Manager review of updates to cash tax model to reflect overall foreign loss of Purdue	1.9	\$ 744	\$ 1,413.60
Ashley Armfield	07/22/20	Updating Purdue cash tax modeling for comments from managing director I. Hirsch (KPMG) relating to overall foreign loss inclusions.	2.1	\$ 534	\$ 1,121.40
Isaac Hirsch	07/22/20	(2.3) Performed additional managing director review of updates to cash tax model to incorporate overall foreign loss account effect	2.3	\$ 819	\$ 1,883.70
Frankie Angeleri	07/22/20	0.2 Review of profit and loss file provided by client; 1.3 Creating list of relevant provided by client documentation to our transfer pricing analysis to determine what information we have / what information we have outstanding; 0.7 Reviewing transfer pricing report; 0.7 Reviewing transfer pricing reports in preparation to add information to preliminary draft memo for transfer pricing.	2.9	\$ 520	\$ 1,508.00
Casey Nunez	07/22/20	(2.7) Performed M&A Tax Senior Manager review of updates to cash tax model to reflect new scenarios without certain tax deductions to perform sensitivity analysis for uncertainty in law changes	2.7	\$ 744	\$ 2,008.80
Devon Rowles	07/22/20	3.9 Updating the cash tax model with regards to managing director (I. Hirsch) review comments received as of 7/22/2020.	3.9	\$ 350	\$ 1,365.00

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#### EXHIBIT C1

### Purdue Pharma L.P. Case No. 19-23649

Name	Date	Description	Hours	Rate	Amount
Pete DiMatteo	07/23/20	(0.3) Meeting between I. Hirsh, P. DiMatteo and G. Baker (all KPMG) to determine additional information required for analysis of certain foreign trusts.	0.3	\$ 650	\$ 195.00
Gabriela Baker	07/23/20	(0.3) Meeting between I. Hirsh, P. DiMatteo and G. Baker (all KPMG) to determine additional information required for analysis of certain foreign trusts.	0.3	\$ 534	\$ 160.20
Isaac Hirsch	07/23/20	(0.3) Meeting between I. Hirsh, P. DiMatteo and G. Baker (all KPMG) to determine additional information required for analysis of certain foreign trusts.	0.3	\$ 819	\$ 245.70
Becky Holtje	07/23/20	0.3 Perform research, as of 7/23/2020, to facilitate cash tax modeling regarding timing of certain deductions.	0.3	\$ 744	\$ 223.20
Jess Commisso	07/23/20	1.7 Review of documentation provided by client, as of $7/23$ , with regards to relevance to tax engagement - in preparation to share with KPMG tax team professionals.	1.7	\$ 350	\$ 595.00
Devon Rowles	07/23/20	2.1 Performed a detailed review of documents received as of 7-23-2020 in order to notify the wider KPMG US team about relevant tax documents received.	2.1	\$ 350	\$ 735.00
Pete DiMatteo	07/23/20	2.3 International tax manager review and concurrently revised alternate planning structure deck deliverable.	2.3	\$ 650	\$ 1,495.00
Casey Nunez	07/23/20	(2.9) Perform M&A Tax Senior Manager Review of planning deck for disposition structuring opportunities	2.9	\$ 744	\$ 2,157.60
Frankie Angeleri	07/24/20	Meeting with M. Minnear (KPMG), K. Taylor (KPMG) and F. Angeleri (KPMG) to discuss the progress of the preliminary draft transfer pricing memo and the profit and loss model.	0.2	\$ 520	\$ 104.00
Kieran Taylor	07/24/20	Meeting with M. Minnear (KPMG), K. Taylor (KPMG) and F. Angeleri (KPMG) to discuss the progress of the preliminary draft transfer pricing memo and the profit and loss model.	0.2	\$ 744	\$ 148.80
Molly Minnear	07/24/20	Meeting with M. Minnear (KPMG), K. Taylor (KPMG) and F. Angeleri (KPMG) to discuss the progress of the preliminary draft transfer pricing memo and the profit and loss model.	0.2	\$ 868	\$ 173.60
Isaac Hirsch	07/24/20	(0.8) Performed analysis of potential partnership tax consequences of proposed Dutch tax planning transactions	0.8	\$ 819	\$ 655.20
Rob Keller	07/26/20	3.5 Performed analysis in connection with potential tax deductions as well as next steps.	3.5	\$ 893	\$ 3,125.50
Becky Holtje	07/27/20	Analysis conducted in connection with potential tax deductions as well as next steps.	0.4	\$ 744	\$ 297.60

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#### EXHIBIT C1

### Purdue Pharma L.P. Case No. 19-23649

Name	Date	Description	Hours	Rate	Amoun
Carol Conjura	07/27/20	R. Holtje (US National Tax - Restructuring Specialist), C. Nunez (Core Engagement Team - US M&A Tax), I. Hirsch (Core Engagement Team - US International Tax), B. Unell (US National Tax - Restructuring Specialist), T. Stone (US National Tax - Trust Specialist), R. Keller (Passthrough Specialist), C. Conjura (Income tax accounting specialist) - partial attendance, P. DiMatteo (Core Engagement Team - US International Tax), A. Armfield (Core Engagement Team - US M&A Tax) met for discussion of research conducted in connection with potential tax deductions as well as next steps.	0.5	\$ 906	\$ 453
Ashley Armfield	07/27/20	R. Holtje (US National Tax - Restructuring Specialist), C. Nunez (Core Engagement Team - US M&A Tax), I. Hirsch (Core Engagement Team - US International Tax), B. Unell (US National Tax - Restructuring Specialist), T. Stone (US National Tax - Trust Specialist), R. Keller (Passthrough Specialist), C. Conjura (Income tax accounting specialist) - partial attendance, P. DiMatteo (Core Engagement Team - US International Tax), A. Armfield (Core Engagement Team - US M&A Tax) met for discussion of research conducted in connection with potential tax deductions as well as next steps.	1.1	\$ 534	\$ 587
Becky Holtje	07/27/20	R. Holtje (US National Tax - Restructuring Specialist), C. Nunez (Core Engagement Team - US M&A Tax), I. Hirsch (Core Engagement Team - US International Tax), B. Unell (US National Tax - Restructuring Specialist), T. Stone (US National Tax - Trust Specialist), R. Keller (Passthrough Specialist), C. Conjura (Income tax accounting specialist) - partial attendance, P. DiMatteo (Core Engagement Team - US International Tax), A. Armfield (Core Engagement Team - US M&A Tax) met for discussion of research conducted in connection with potential tax deductions as well as next steps.	1.1	\$ 744	\$ 818
Bela Unell	07/27/20	R. Holtje (US National Tax - Restructuring Specialist), C. Nunez (Core Engagement Team - US M&A Tax), I. Hirsch (Core Engagement Team - US International Tax), B. Unell (US National Tax - Restructuring Specialist), T. Stone (US National Tax - Trust Specialist), R. Keller (Passthrough Specialist), C. Conjura (Income tax accounting specialist) - partial attendance, P. DiMatteo (Core Engagement Team - US International Tax), A. Armfield (Core Engagement Team - US M&A Tax) met for discussion of research conducted in connection with potential tax deductions as well as next steps.	1.1	\$ 744	\$ 818
Casey Nunez	07/27/20	R. Holtje (US National Tax - Restructuring Specialist), C. Nunez (Core Engagement Team - US M&A Tax), I. Hirsch (Core Engagement Team - US International Tax), B. Unell (US National Tax - Restructuring Specialist), T. Stone (US National Tax - Trust Specialist), R. Keller (Passthrough Specialist), C. Conjura (Income tax accounting specialist) - partial attendance, P. DiMatteo (Core Engagement Team - US International Tax), A. Armfield (Core Engagement Team - US M&A Tax) met for discussion of research conducted in connection with potential tax deductions as well as next steps.	1.1	\$ 744	\$ 818

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#### EXHIBIT C1

### Purdue Pharma L.P. Case No. 19-23649

Name	Date	Description	Hours	Rate	Amount
Isaac Hirsch	07/27/20	R. Holtje (US National Tax - Restructuring Specialist), C. Nunez (Core Engagement Team - US M&A Tax), I. Hirsch (Core Engagement Team - US International Tax), B. Unell (US National Tax - Restructuring Specialist), T. Stone (US National Tax - Trust Specialist), R. Keller (Passthrough Specialist), C. Conjura (Income tax accounting specialist) - partial attendance, P. DiMatteo (Core Engagement Team - US International Tax), A. Armfield (Core Engagement Team - US M&A Tax) met for discussion of research conducted in connection with potential tax deductions as well as next steps.	1.1	\$ 819	\$ 900.90
Pete DiMatteo	07/27/20	R. Holtje (US National Tax - Restructuring Specialist), C. Nunez (Core Engagement Team - US M&A Tax), I. Hirsch (Core Engagement Team - US International Tax), B. Unell (US National Tax - Restructuring Specialist), T. Stone (US National Tax - Trust Specialist), R. Keller (Passthrough Specialist), C. Conjura (Income tax accounting specialist) - partial attendance, P. DiMatteo (Core Engagement Team - US International Tax), A. Armfield (Core Engagement Team - US M&A Tax) met for discussion of research conducted in connection with potential tax deductions as well as next steps.	1.1	\$ 650	\$ 715.00
Rob Keller	07/27/20	R. Holtje (US National Tax - Restructuring Specialist), C. Nunez (Core Engagement Team - US M&A Tax), I. Hirsch (Core Engagement Team - US International Tax), B. Unell (US National Tax - Restructuring Specialist), T. Stone (US National Tax - Trust Specialist), R. Keller (Passthrough Specialist), C. Conjura (Income tax accounting specialist) - partial attendance, P. DiMatteo (Core Engagement Team - US International Tax), A. Armfield (Core Engagement Team - US M&A Tax) met for discussion of research conducted in connection with potential tax deductions as well as next steps.	1.1	\$ 893	\$ 982.30
Tracy Stone	07/27/20	R. Holtje (US National Tax - Restructuring Specialist), C. Nunez (Core Engagement Team - US M&A Tax), I. Hirsch (Core Engagement Team - US International Tax), B. Unell (US National Tax - Restructuring Specialist), T. Stone (US National Tax - Trust Specialist), R. Keller (Passthrough Specialist), C. Conjura (Income tax accounting specialist) - partial attendance, P. DiMatteo (Core Engagement Team - US International Tax), A. Armfield (Core Engagement Team - US M&A Tax) met for discussion of research conducted in connection with potential tax deductions as well as next steps.	1.1	\$ 906	\$ 996.60
Isaac Hirsch	07/27/20	(1.4) Perform managing director review of updates to Dutch planning proposal to incorporate additional guidance form KPMG Netherlands	1.4	\$ 819	\$ 1,146.60
Tracy Stone	07/27/20	0.5 Consideration related to deductibility of payment by trust beneficiaries; 0.5 discussion via email with R. Keller KPMG) related to same; 0.5 performed analysis related to treatment of various attributes at trust termination;	1.5	\$ 906	\$ 1,359.00
Gabriela Baker	07/27/20	Draft of Information Request List (IRL) with respect to Partnership Undistributed Income Capital Account Analysis.	2.1	\$ 534	\$ 1,121.40

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### EXHIBIT C1

#### Purdue Pharma L.P. Case No. 19-23649

Name	Date	Description	Hours	Rate	Amount
Isaac Hirsch	07/27/20	(2.8) Managing director review of additional changes to cash tax model to incorporate estimated effect of overall foreign loss account	2.8	\$ 819	\$ 2,293.20
Frankie Angeleri	07/27/20	3.5 Began to create Profit & Loss model and concurrently performing related calculations based on transfer pricing policies.	3.5	\$ 520	\$ 1,820.00
Jim Tod	07/28/20	(0.3) Reviewing prior notes related to potential U.S. tax implications of proposed Dutch/Canadian transactions in order to prepare for call with KPMG team later in the day.	0.3	\$ 906	\$ 271.80
Anthony Minervini	07/28/20	(0.7) Discussion with J. Tod (US National Tax - Partnership Specialist), A. Minervini (US National Tax - Partnership Specialist), C. Nunez (Core Engagement Team - US M&A Tax), I. Hirsch (Core Engagement Team - US International Tax), and P. DiMatteo (Core Engagement Team - US International Tax) regarding potential U.S. tax implications of proposed Dutch/Canadian transactions as well as next steps;	0.7	\$ 893	\$ 625.10
Casey Nunez	07/28/20	(0.7) Discussion with J. Tod (US National Tax - Partnership Specialist), A. Minervini (US National Tax - Partnership Specialist), C. Nunez (Core Engagement Team - US M&A Tax), I. Hirsch (Core Engagement Team - US International Tax), and P. DiMatteo (Core Engagement Team - US International Tax) regarding potential U.S. tax implications of proposed Dutch/Canadian transactions as well as next steps	0.7	\$ 744	\$ 520.80
Isaac Hirsch	07/28/20	(0.7) Discussion with J. Tod (US National Tax - Partnership Specialist), A. Minervini (US National Tax - Partnership Specialist), C. Nunez (Core Engagement Team - US M&A Tax), I. Hirsch (Core Engagement Team - US International Tax), and P. DiMatteo (Core Engagement Team - US International Tax) regarding potential U.S. tax implications of proposed Dutch/Canadian transactions as well as next steps	0.7	\$ 819	\$ 573.30
Jim Tod	07/28/20	(0.7) Discussion with J. Tod (US National Tax - Partnership Specialist), A. Minervini (US National Tax - Partnership Specialist), C. Nunez (Core Engagement Team - US M&A Tax), I. Hirsch (Core Engagement Team - US International Tax), and P. DiMatteo (Core Engagement Team - US International Tax) regarding potential U.S. tax implications of proposed Dutch/Canadian transactions as well as next steps;	0.7	\$ 906	\$ 634.20
Pete DiMatteo	07/28/20	(0.7) Discussion with J. Tod (US National Tax - Partnership Specialist), A. Minervini (US National Tax - Partnership Specialist), C. Nunez (Core Engagement Team - US M&A Tax), I. Hirsch (Core Engagement Team - US International Tax), and P. DiMatteo (Core Engagement Team - US International Tax) regarding potential U.S. tax implications of proposed Dutch/Canadian transactions as well as next steps.	0.7	\$ 650	\$ 455.00

# **19-23649**-std **Doc 1935 Filed D9/D3/20 Entered D9/D3/20 22:40:39 Main Document Pry 621 of 1228**

#### EXHIBIT C1

### Purdue Pharma L.P. Case No. 19-23649

Name	Date	Description	Hours	Rate	Amount
Frankie Angeleri	07/28/20	Continued (on same day) to create Profit & Loss model and concurrently performing related calculations based on transfer pricing policies.	0.7	\$ 520	\$ 364.00
Rob Keller	07/28/20	0.8 Performed research in connection with potential tax deductions, as well as next steps.	0.8	\$ 893	\$ 714.40
Isaac Hirsch	07/28/20	(0.8) Perform managing director review of additional analysis of US federal income tax consequences of proposed Dutch disposition planning	0.8	\$ 819	\$ 655.20
Anthony Minervini	07/28/20	Per request from P. DiMatteo (KPMG), reviewed and concurrently commented on partnership tax considerations for Netherlands planning in draft step plan.	1.0	\$ 893	\$ 893.00
Jess Commisso	07/28/20	1.4 Creation of information request list pursuant to undistributed earnings analysis of foreign trusts.	1.4	\$ 350	\$ 490.00
Howard Steinberg	07/28/20	Performed Partner review of client deliverables regarding tax analysis of Mundipharma disposition.	1.5	\$ 856	\$ 1,284.00
Pete DiMatteo	07/28/20	1.9 Perform international tax manager review and concurrently updated information request listing regarding testing of certain assumptions related to global cash tax model.	1.9	\$ 650	\$ 1,235.00
Casey Nunez	07/28/20	(1.9) Performed M&A Tax Senior Manager review of updates to cash tax model for application of Purdue foreign tax credit profile.	1.9	\$ 744	\$ 1,413.60
Isaac Hirsch	07/28/20	(2.2) Performed managing director review of additional updates to cash tax model to implement summary of effect of overall foreign loss account on cash taxes	2.2	\$ 819	\$ 1,801.80
Frankie Angeleri	07/28/20	3.9 Continued from 7/27 to create Profit & Loss model and concurrently performing related calculations based on transfer pricing policies.	3.9	\$ 520	\$ 2,028.00
Tracy Stone	07/29/20	Performed WNT research over law regarding tax benefit rule and trust distributions related to Purdue Pharma.	0.5	\$ 906	\$ 453.00
Ashley Armfield	07/29/20	0.9 Reviewed new guidelines released pertaining to certain tax elections.	0.9	\$ 534	\$ 480.60
Rob Keller	07/29/20	1.0 Continued, from 7/28, to perform research in connection with potential tax deductions, as well as next steps.	1.0	\$ 893	\$ 893.00
Frankie Angeleri	07/29/20	Continued from 7/28 to create Profit & Loss model and concurrently performing related calculations based on transfer pricing policies.	1.5	\$ 520	\$ 780.00
Howard Steinberg	07/29/20	(1.6) Perform Partner review of client deliverables, as of 7/29/2020, regarding tax analysis of Mundipharma disposition.	1.6	\$ 856	\$ 1,369.60
Mark Hoffenberg	07/29/20	Performed WNT review of update on Overall foreign loss (OFL) and Dutch/Canadian planning issues (0.6), and review of latest version of the Dutch/Canada planning deck with regards to same (1.0)	1.6	\$ 980	\$ 1,568.00

# **19-23649**-8td **Doc 1935** Filed D9/D3/20 Entered D9/D3/20 22:40:39 Main Document Fig 522 off 1228

#### EXHIBIT C1

### Purdue Pharma L.P. Case No. 19-23649

Name	Date	Description	Hours	Rate	Amount
Isaac Hirsch	07/29/20	(1.1) Performed managing director review of additional updates to cash tax model to implement summary of effect of overall foreign loss account on cash taxes; (0.6) performed analysis of US federal income tax consequences of proposed Dutch disposition planning	1.7	\$ 819	\$ 1,392.30
Pete DiMatteo	07/29/20	2.1 Performed international tax manager updates to information request listing regarding testing of certain assumptions related to global cash tax model.	2.1	\$ 650	\$ 1,365.00
Casey Nunez	07/29/20	(1.3) Performed M&A Tax Senior Manager review of new information request list to evaluate tax basis and undistributed income. (2.1) M&A Tax Senior Manager review of updates to cash tax model for reflecting prior foreign losses of various entities.	3.4	\$ 744	\$ 2,529.60
Frankie Angeleri	07/30/20	Meeting with K. Taylor (KPMG) and F. Angeleri (KPMG) to discuss findings, questions and next steps with regard to transfer pricing.	0.4	\$ 520	\$ 208.00
Kieran Taylor	07/30/20	Meeting with K. Taylor (KPMG) and F. Angeleri (KPMG) to discuss findings, questions and next steps with regard to transfer pricing.	0.4	\$ 744	\$ 297.60
Douglas Holland	07/30/20	0.6 Telephone conference with D. Holland (US National Office - International Tax Specialist), I. Hirsch (Core Engagement Team - International Tax), and P. DiMatteo (Core Engagement Team - International Tax) (all KPMG) to discuss potential planning with respect to contemplated Dutch transactions and updates to global cash tax model	0.6	\$ 985	\$ 591.00
Isaac Hirsch	07/30/20	0.6 Telephone conference with D. Holland (US National Office - International Tax Specialist), I. Hirsch (Core Engagement Team - International Tax), and P. DiMatteo (Core Engagement Team - International Tax) (all KPMG) to discuss potential planning with respect to contemplated Dutch transactions and updates to global cash tax model	0.6	\$ 819	\$ 491.40
Pete DiMatteo	07/30/20	0.6 Telephone conference with D. Holland (US National Office - International Tax Specialist), I. Hirsch (Core Engagement Team - International Tax), and P. DiMatteo (Core Engagement Team - International Tax) (all KPMG) to discuss potential planning with respect to contemplated Dutch transactions and updates to global cash tax model	0.6	\$ 650	\$ 390.00
Tracy Stone	07/30/20	Continued, same day, to perform research relating to various legal theories associated with payments to the Purdue settlement vehicle.	0.6	\$ 906	\$ 543.60
Anthony Minervini	07/30/20	J. Tod (US National Tax - Pass-through Specialist), A. Minervini (US National Tax - Pass-through Specialist), R. Keller (US National Tax - Pass-through Specialist), discussion of research conducted in connection with certain potential tax deductions as well as next steps.	0.8	\$ 893	\$ 714.40
Jim Tod	07/30/20	J. Tod (US National Tax - Pass-through Specialist), A. Minervini (US National Tax - Pass-through Specialist), R. Keller (US National Tax - Pass-through Specialist), discussion of research conducted in connection with certain potential tax deductions as well as next steps.	0.8	\$ 906	\$ 724.80

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#### EXHIBIT C1

### Purdue Pharma L.P. Case No. 19-23649

Name	Date	Description	Hours	Rate	Amount
Rob Keller	07/30/20	J. Tod (US National Tax - Pass-through Specialist), A. Minervini (US National Tax - Pass-through Specialist), R. Keller (US National Tax - Pass-through Specialist), discussion of research conducted in connection with certain potential tax deductions as well as next steps.	0.8	\$ 893	\$ 714.40
Rob Keller	07/30/20	1.0 T. Stone (US National Tax - Trust Specialist) and R. Keller (Pass-through Specialist) met for discussion of research conducted in connection with payments (and corresponding deductibility of such payments) that will be made to the settlement vehicle as well as next steps.	1.0	\$ 893	\$ 893.00
Tracy Stone	07/30/20	1.0 T. Stone (US National Tax - Trust Specialist) and R. Keller (Passthrough Specialist) met for discussion of research conducted in connection with payments (and corresponding deductibility of such payments) that will be made to the settlement vehicle as well as next steps.	1.0	\$ 906	\$ 906.00
Jess Commisso	07/30/20	1.8 Creation of information request list for analysis of undistributed income and basis of Mundipharma entities.	1.8	\$ 350	\$ 630.00
Frankie Angeleri	07/30/20	Creating summary of the financial profit and loss model for 2017 (1.0), 2018 (0.7), and 2019 (0.6).	2.3	\$ 520	\$ 1,196.00
Isaac Hirsch	07/30/20	(3.4) Updates to cash tax model to incorporate recently-released regulations regarding the global intangible low-taxed income high-tax exception	3.4	\$ 819	\$ 2,784.60
Tracy Stone	07/30/20	Prepared summary of research relating to various legal theories associated with payments to the Purdue settlement vehicle.	3.9	\$ 906	\$ 3,533.40
Douglas Holland	07/31/20	0.5 Performed Principal WNT review of tax implications, set forth in PowerPoint proposal, of Dutch and Canadian tax planning opportunities	0.5	\$ 985	\$ 492.50
Isaac Hirsch	07/31/20	(0.6) Analysis of US federal income tax effects of income distributed from partnership for purposes of cash tax modeling.	0.6	\$ 819	\$ 491.40
Pete DiMatteo	07/31/20	1.6 Performed international tax manager review of 2013-2018 US tax return filings for a US partnership to gain insight regarding the entity's historical tax profile.	1.6	\$ 650	\$ 1,040.00
Becky Holtje	07/31/20	1.7 Performed research, as of 7/31/2020, to facilitate cash tax modeling regarding timing of certain deductions.	1.7	\$ 744	\$ 1,264.80
Anthony Minervini	07/31/20	Review and concurrently comment on partnership tax considerations for Canada planning in draft step plan.	2.0	\$ 893	\$ 1,786.00
Frankie Angeleri	07/31/20	2.1 Continued, from $7/30,$ creating summary of the financial profit and loss model for 2017, 2018, and 2019.	2.1	\$ 520	\$ 1,092.00
		<b>Total Bankruptcy Tax Consulting Services</b>	349.0		\$ 229,296.10

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**EXHIBIT C2** 

### Purdue Pharma L.P. Case No. 19-23649

Non -Working Travel Time July 1, 2020 through July 31, 2020

Name	Date	Description	Hours	Rate	Amount	
		no fees billed for these services in current month				
		Total Non-Working Travel Time		•	\$ -	_

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**EXHIBIT C3** 

Purdue Pharma L.P.
Case No. 19-23649
Retention Services
July 1, 2020 through July 31, 2020

Name	Date	Description	Hours	Rate	Amount
	n	o fees billed for these services in current month			
		<b>Total Retention Services</b>	0.0		\$ -

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#### **EXHIBIT C4**

#### Purdue Pharma L.P. Case No. 19-23649

Fee Application Preparation Services July 1, 2020 through July 31, 2020

Name	Date	Description	Hours	Rate	A	Amount
Wendy Shaffer	07/02/20	0.7 Updated Purdue 5th monthly fee statement per direction from Davis Polk, re-PDF and send for filing.	0.7	\$ 202	\$	141.40
Wendy Shaffer	07/07/20	0.3 Prepared Purdue May file in Excel for the fee examiner and send to M. Plangman (KPMG) for approval of same	0.3	\$ 202	\$	60.60
Monica Plangman	07/07/20	(0.1) Review of Fee Examiner report and (0.1) send to W. Shaffer (KPMG).	0.2	\$ 264	\$	52.80
Wendy Shaffer	07/08/20	0.1 Drafted email to B. Masumoto (US Trustee) to provide copy of KPMG's 5th monthly fee statement in the Purdue Pharma matter in both PDF and Excel format.	0.1	\$ 202	\$	20.20
Wendy Shaffer	07/13/20	0.3 Updated to Purdue June monthly fee statement to include additional data received from professionals as of 7/13/2020	0.3	\$ 202	\$	60.60
Monica Plangman	07/14/20	Performed Associate director initial review of interim documents and provide comments.	0.5	\$ 264	\$	132.00
Monica Plangman	07/15/20	Fee statement review of documents, as of 7/15/20, and concurrently provide comments.	2.7	\$ 264	\$	712.80
Wendy Shaffer	07/15/20	1.9 Updates to Purdue Pharma 2nd Interim statement per review comments received from M. Plangman (KPMG); 0.1 email to H. Steinberg (KPMG) to request approval of Purdue Pharma 2nd Interim fee statement; 0.2 PDF Purdue Pharma 2nd Interim statement and 0.1 send to M. Plangman (KPMG) for final review/approval before sending to counsel for filing; 0.1 Updates to exhibit C1 of Purdue June monthly fee statement to include data received from professionals as of 7/15/2020; 0.1 email to M. Pera (Davis Polk) to request filing/services of KPMG's 2nd Interim fee statement; 0.2 Review work in progress report for Purdue for July to confirm billable hours from 7/1 - 7/14;	2.6	\$ 202	\$	525.20
Teresa Williams	07/15/20	Updated assigned portion of exhibit C1 of Purdue Pharma July monthly fee statement to include data received from professionals as of 7/15/2020	2.4	\$ 140	\$	336.00
Teresa Williams	07/16/20	Update assigned portion of exhibit C1 of Purdue Pharma July monthly fee statement to include data received from professionals as of 7/16/2021	0.7	\$ 140	\$	98.00
Wendy Shaffer	07/16/20	1.0 Updated exhibit C1 of Purdue June monthly fee statement to include data received from professionals as of 7/16/2020.	1.0	\$ 202	\$	202.00
Wendy Shaffer	07/19/20	0.9 Updated exhibit C1 of Purdue June monthly fee statement to include data received from professionals as of 7/20/2020 and 0.1 send June file to M. Land (KPMG) to request updates to monthly fee statement with regards to previous comments from Davis Polk	1.0	\$ 202	\$	202.00
Wendy Shaffer	07/20/20	0.1 Communication with M. Land (KPMG) regarding updates requested to Purdue June fee statement.	0.1	\$ 202	\$	20.20
Wendy Shaffer	07/21/20	1.0 Updated Purdue Pharma July monthly fee statement per direction from M. Land (KPMG) and 0.1 drafted email to send final draft to M. Plangman (KPMG) for Associate Director review.	1.1	\$ 202	\$	222.20

# **19-23649**-strd **Doc 1935 Filed 09/03/20 Entered 09/03/20 22:40:39 Main Document Ptg 72/7 off 1228**

#### **EXHIBIT C4**

#### Purdue Pharma L.P. Case No. 19-23649

Fee Application Preparation Services July 1, 2020 through July 31, 2020

Name	Date	Description	Hours	Rate	Amount
Wendy Shaffer	07/22/20	0.1 Updates to Purdue June monthly fee statement to incorporate KPMG foreign member time detail received as of 7/22/2020 and 0.1 send email to M. Plangman (KPMG) to provide updated draft of June fee statement for review.	0.2	\$ 202	\$ 40.40
Monica Plangman	07/27/20	Performed Associate director review of fee statement and concurrently provide comments.	1.5	\$ 264	\$ 396.00
Wendy Shaffer	07/28/20	0.6 Updates to exhibit C1 of Purdue July monthly fee statement to include data received from professionals as of 7/29/2020; 0.6 Updates to Purdue 6th monthly per review comments from M. Plangman (KPMG); 0.1 send copy of finalized exhibits to Partners/team leads to request approval of same;	1.3	\$ 202	\$ 262.60
Casey Nunez	07/30/20	Performed Senior Manager review of Purdue June monthly fee statement and concurrently drafted review comments to provide to W. Shaffer (KPMG)	1.5	\$ 744	\$ 1,116.00
Wendy Shaffer	07/30/20	0.3 Updated Purdue Pharma 6th monthly fee statement per direction from A. Armfield (KPMG) and updated Purdue cover sheet with regards to same; 0.1 drafted email to send copy of final drafts to M. Plangman (KPMG) for approval prior to sending to partner for sign-off; 0.1 drafted email to H. Steinberg KPMG) to request approval / permission to apply electronic signature to final drafts of Purdue 6th monthly fee statement.	0.5	\$ 202	\$ 101.00
Wendy Shaffer	07/31/20	0.2 Finalized (PDF) Purdue June monthly fee statement in preparation for filing and 0.1 draft email to M. Plangman (KPMG) to request approval of same prior to sending to counsel for filing/service; 0.1 drafted email to Davis Polk to request filing and services of Purdue 6th monthly fee statement;	0.4	\$ 202	\$ 80.80
		Total Fee Application Preparation Services	19.1		\$ 4,782.80

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#### **EXHIBIT D**

### Purdue Pharma L.P. Case No. 19-23649

Summary of Out of Pocket Expenses July 1, 2020 through July 31, 2020

Category	Amo	Amount		
Airfare	\$	-		
Lodging	\$	-		
Meals	\$	-		
Ground Transportation	\$	-		
Miscellaneous	\$	-		
Total	\$	-		

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#### **EXHIBIT D1**

### Purdue Pharma L.P. Case No. 19-23649

Detail of Out of Pocket Expenses July 1, 2020 through July 31, 2020

Name	Date	Description	Amount
		Air Fare Subtotal	\$ -
		Lodging Subtotal	\$ -
		Meals Subtotal	\$ -
		<b>Total Ground Transportation</b>	\$ -
		Miscellaneous Subtotal	\$ -
		Total Out of Pocket Expenses	\$ -

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### **Schedule 3**

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### UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

	•	
	•	
In re:	:	Chapter 11

PURDUE PHARMA L.P., et al., : Case No. 19-23649 (RDD)

Debtors.<sup>1</sup> : (Jointly Administered)

# EIGHTH MONTHLY FEE STATEMENT OF KPMG LLP FOR COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED AS TAX CONSULTANT FOR THE DEBTORS AND THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR THE PERIOD FROM AUGUST 1, 2020 THROUGH AUGUST 31, 2020

Name of Applicant:	KPMG 1	LLP			
Authorized to Provide Professional Services to:	The Debtors and the Official Committee of Unsecured Creditors				
Date of Retention: February 24, 2020, <i>nunc pro tunc</i> December 23, 2019					
Period for Which Compensation and Reimbursement is Sought:	August 1, 2020 through August 31, 2020				
Amount of Compensation Sought as Actual, Reasonable, and Necessary:	\$	161,831.30			
Less 20% Holdback:	\$	(32,366.26)			
Amount of Expense Reimbursement Sought as Actual, Reasonable, and Necessary:	\$	0.00			
Total Fees and Expenses Due:	\$	129,465.04			

The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

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Dated: October 2, 2020

/s/ Howard Steinberg
Howard Steinberg
Partner, KPMG LLP

1350 Avenue of the Americas New York, New York 10019

(212) 872-6562

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#### **EXHIBIT A**

### Purdue Pharma L.P. Case No. 19-23649

Summary Of Hours and Discounted Fees Incurred By Professional August 1, 2020 through August 31, 2020

Professional Person	Position & Department	Country of Origin	Total Billed Hours	Hourly Billing Rate		Total Compensation		
Anthony Minervini	Managing Director - Washington National Tax	US	5.3	\$	893	\$	4,732.90	
Aroen Rambhadjan	Partner - Tax	Netherlands	0.2	\$	884	\$	176.80	
Arpit Desai	Senior Manager - Tax	UK	0.4	\$	750	\$	300.00	
Ashley Armfield	Senior Associate - M&A Tax	US	53.3	\$	534	\$	28,462.20	
Becky Holtje	Senior Manager - Washington National Tax	US	8.1	\$	744	\$	6,026.40	
Bela Unell	Senior Manager - Washington National Tax	US	2.2	\$	744	\$	1,636.80	
Casey Nunez	Senior Manager - M&A Tax	US	9.4	\$	744	\$	6,993.60	
Curt Wilson	Senior Manager - Washington National Tax	US	3.0	\$	744	\$	2,232.00	
Devon Rowles	Associate - M&A Tax	US	14.0	\$	350	\$	4,900.00	
Douglas Holland	Principal - Washington National Tax	US	2.5	\$	985	\$	2,462.50	
Frankie Angeleri	Associate - Economic & Valuation Services	US	46.3	\$	520	\$	24,076.00	
Gavin Little	Managing Director - Tax	UK	0.3	\$	985	\$	295.50	
Howard Steinberg	Partner - M&A Tax	US	6.7	\$	856	\$	5,735.20	
Isaac Hirsch	Managing Director - Int'l Tax	US	39.4	\$	819	\$	32,268.60	
Jess Commisso	Associate - M&A Tax	US	19.6	\$	350	\$	6,860.00	
Jim Tod	Partner - Washington National Tax	US	1.2	\$	906	\$	1,087.20	
Kieran Taylor	Senior Manager - Tax	US	10.9	\$	744	\$	8,109.60	
Lukas van der Veen	Manager - Tax	Netherlands	1.1	\$	565	\$	621.50	
Madeleine Latham	Associate - Tax	UK	0.5	\$	343	\$	171.50	
Molly Minnear	Principal - Economic & Valuation Services	US	0.8	\$	868	\$	694.40	
Monica Plangman	Associate Director - Bankruptcy	US	1.9	\$	264	\$	501.60	
Pete DiMatteo	Manager - Int'l Tax	US	17.1	\$	650	\$	11,115.00	
Rob Keller	Managing Director - Washington National Tax	US	0.2	\$	893	\$	178.60	
Tracy Stone	Principal - Washington National Tax	US	9.2	\$	906	\$	8,335.20	
Wendy Shaffer	Manager - Bankruptcy	US	19.1	\$	202	\$	3,858.20	
Subtotal of Hours and D	iscounted Fees		272.7			\$	161,831.30	
<b>Total Discounted Fees</b>						\$	161,831.30	
Out of Pocket Expenses						\$		
Total Fees and Out of Pocket Expenses						\$	161,831.30	
Less Holdback Adjustmen						\$	(32,366.26)	
Net Requested Fees & O	ut of Pocket Expenses					\$	129,465.04	

KPMG LLP Monthly Fee Statement Page 1 of 22

**Blended Hourly Rate** 

\$

593.44

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#### **EXHIBIT B**

### Purdue Pharma L.P. Case No. 19-23649

Summary of Hours and Discounted Fees Incurred by Category August 1, 2020 through August 31, 2020

Category	Exhibit	Total Billed Hours	Total Fees Requested		
Bankruptcy Tax Consulting Services	C1	251.7	\$	157,471.50	
Non -Working Travel Time	C2	0.0	\$	-	
Retention Services	C3	0.0	\$	-	
Fee Application Preparation Services	C4	21.0	\$	4,359.80	
Total		272.7	\$	161,831.30	

KPMG LLP Monthly Fee Statement Page 2 of 22

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#### **EXHIBIT C1**

### Purdue Pharma L.P. Case No. 19-23649

Name	Date	Description	Hours	Rate	Amount
Arpit Desai	08/03/20	Performing senior manager review of the email response drafted by M. Latham (KPMG UK) regarding UK tax implications of a change in KPMG US assumption.	0.2	\$ 750	\$ 150.00
Madeleine Latham	08/03/20	Simultaneously researching and drafting an email response to the KPMG US team following their request for analysis regarding the UK tax implications of a change in their assumption.	0.5	\$ 343	\$ 171.50
Ashley Armfield	08/03/20	0.8 Meeting between A. Armfield, D. Rowles, and J. Commisso (all KPMG) to discuss updates that need to be performed regarding Purdue cash tax model for inclusion of certain tax regulations.	0.8	\$ 534	\$ 427.20
Devon Rowles	08/03/20	0.8 Meeting between A. Armfield, D. Rowles, and J. Commisso (all KPMG) to discuss updates that need to be performed regarding Purdue cash tax model related to certain regulations.	0.8	\$ 350	\$ 280.00
Jess Commisso	08/03/20	0.8 Meeting between A. Armfield, D. Rowles, and J. Commisso (all KPMG) to discuss updates that need to be performed regarding Purdue cash tax model related to certain regulations.	0.8	\$ 350	\$ 280.00
Ashley Armfield	08/03/20	1.2 Performed research regarding certain tax issues relevant to managing director comments pursuant to updating the cash tax model.	1.2	\$ 534	\$ 640.80
Anthony Minervini	08/03/20	Performed WNT Managing Director review and concurrently comment on step plan Mundipharma Disposition Analysis.	1.2	\$ 893	\$ 1,071.60
Pete DiMatteo	08/03/20	1.6 Performed various updates to information request list (IRL) related to assumptions made in connection with the global cash tax model	1.6	\$ 650	\$ 1,040.00
Frankie Angeleri	08/03/20	Continue, from earlier in the day, to create profit and loss tables for each Purdue entity based on their financials.	2.2	\$ 520	\$ 1,144.00
Casey Nunez	08/03/20	•	2.6	\$ 744	\$ 1,934.40
Anthony Minervini	08/03/20	Analyzed tax rules potentially applicable to specific transaction steps in connection with review of entity disposition step plan.	2.8	\$ 893	\$ 2,500.40
Ashley Armfield	08/03/20	3.2 Updating Power BI tool (a Microsoft office tool similar to excel but used to create charts / visuals for deliverables) pursuant to providing a updated cash tax results relating certain tax rules.	3.2	\$ 534	\$ 1,708.80
Devon Rowles	08/03/20	3.9 Updating to cash tax model for inclusion of certain tax rules.	3.9	\$ 350	\$ 1,365.00
Frankie Angeleri	08/03/20	Continue, from 7/31, to create profit and loss tables for each Purdue entity based on their financials.	3.9	\$ 520	\$ 2,028.00
Arpit Desai	08/04/20	Updating the draft email response to the KPMG US team regarding the UK tax implications of a change in an assumption as per comments received from KPMG UK managing director G. Little.	0.2	\$ 750	\$ 150.00

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#### **EXHIBIT C1**

### Purdue Pharma L.P. Case No. 19-23649

Name	Date	Description	Hours	Rate	Amount
Gavin Little	08/04/20	Performing managing director review of the email response drafted by A. Desai and M. Latham (both KPMG UK) regarding the UK tax implications of a change in KPMG US assumption.	0.3	\$ 985	\$ 295.50
Frankie Angeleri	08/04/20	0.4 Meeting with K. Taylor (KPMG) and F. Angeleri (KPMG) to discuss the findings and next steps with regard to transfer pricing.	0.4	\$ 520	\$ 208.00
Kieran Taylor	08/04/20	0.4 Meeting with K. Taylor (KPMG) and F. Angeleri (KPMG) to discuss the findings and next steps with regard to transfer pricing.	0.4	\$ 744	\$ 297.60
Frankie Angeleri	08/04/20	Updated the transaction flow chart to show intercompany transactions based on discussion with K. Taylor (KPMG).	0.6	\$ 520	\$ 312.00
Ashley Armfield	08/04/20	1.8 Senior Associate review of updates performed to cash tax model relating to certain tax regulations by D. Rowles (KPMG).	1.8	\$ 534	\$ 961.20
Devon Rowles	08/04/20	2.1 Continued (from prior day) updating cash tax model for inclusion of the certain tax regulations.	2.1	\$ 350	\$ 735.00
Frankie Angeleri	08/04/20	Continued, from earlier in the day, to create profit & loss tables for each Purdue entity based on a recalculation of financials.	2.6	\$ 520	\$ 1,352.00
Pete DiMatteo	08/04/20	2.8 Performed analysis regarding potential advantages / disadvantages of potential US tax elections related to the owners of various Mundipharma entities	2.8	\$ 650	\$ 1,820.00
Isaac Hirsch	08/04/20	Performed international tax Managing Director review of latest round of updates to cash tax model to account for certain tax rules.	3.2	\$ 819	\$ 2,620.80
Ashley Armfield	08/04/20	3.9 Updating cash tax model to reflect changes for certain tax rules.	3.9	\$ 534	\$ 2,082.60
Frankie Angeleri	08/04/20	Began to create profit & loss tables for each Purdue entity based on a recalculation of financials.	3.9	\$ 520	\$ 2,028.00
Ashley Armfield	08/05/20	0.4 Drafted email to I. Hirsch (KPMG) relating to updates made to the cash tax model for certain tax rules.	0.4	\$ 534	\$ 213.60
Ashley Armfield	08/05/20	(0.6) Meeting between I. Hirsch, C. Nunez, A. Armfield, D. Rowles, and J. Commisso (all KPMG) to discuss updates made to the Purdue cash tax model and next steps for a client deliverable of the updated model	0.6	\$ 534	\$ 320.40
Casey Nunez	08/05/20	(0.6) Meeting between I. Hirsch, C. Nunez, A. Armfield, D. Rowles, and J. Commisso (all KPMG) to discuss updates made to the Purdue cash tax model and next steps for a client deliverable of the updated model	0.6	\$ 744	\$ 446.40
Devon Rowles	08/05/20		0.6	\$ 350	\$ 210.00

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#### **EXHIBIT C1**

### Purdue Pharma L.P. Case No. 19-23649

Name	Date	Description	Hours	Rate	Amount
Isaac Hirsch	08/05/20	(0.6) Meeting between I. Hirsch, C. Nunez, A. Armfield, D. Rowles, and J. Commisso (all KPMG) to discuss updates made to the Purdue cash tax model and next steps for a client deliverable of the updated model	0.6	\$ 819	\$ 491.40
Jess Commisso	08/05/20	(0.6) Meeting between I. Hirsch, C. Nunez, A. Armfield, D. Rowles, and J. Commisso (all KPMG) to discuss updates made to the Purdue cash tax model and next steps for a client deliverable of the updated model	0.6	\$ 350	\$ 210.00
Devon Rowles	08/05/20	0.6 Updates to the cash tax model for senior associate (A. Armfield) review comments.	0.6	\$ 350	\$ 210.00
Pete DiMatteo	08/05/20	0.8 Continue (from previous day) to perform analysis regarding potential US tax elections.	0.8	\$ 650	\$ 520.00
Isaac Hirsch	08/05/20	(0.9) Performed international tax Managing Director review of calculation of potential tax consequences for purposes of cash tax model updates;	0.9	\$ 819	\$ 737.10
Lukas van der Veen	08/05/20	Begin to draft e-mail to I. Hirsch (KPMG US) on potential cash tax consequences related to the disposition of Dutch Purdue companies.	1.0	\$ 565	\$ 565.00
Isaac Hirsch	08/05/20	(1.2) Performed international tax Managing Director review of updates to cash tax model to account for certain tax rules.	1.2	\$ 819	\$ 982.80
Jess Commisso	08/05/20	1.2 Review of the cash tax model updates pursuant to preparing a client presentation in Power BI (a Microsoft office tool similar to excel but used to create charts / visuals for deliverables),	1.2	\$ 350	\$ 420.00
Frankie Angeleri	08/05/20	Continued, from earlier in the day, to update profit & loss tables for each Purdue entity based on a recalculation of financials.	1.2	\$ 520	\$ 624.00
Casey Nunez	08/05/20	(1.7) Performed M&A Tax Senior Manager review of updates to cash tax model for application of certain tax deductions.	1.7	\$ 744	\$ 1,264.80
Frankie Angeleri	08/05/20	Updated the profit & loss tables for each Purdue entity based on a recalculation of financials.	2.8	\$ 520	\$ 1,456.00
Ashley Armfield	08/05/20	3.4 Preparing a reconciliation between new scenarios added to cash tax model pursuant to providing an update relating to certain tax rules.	3.4	\$ 534	\$ 1,815.60
Ashley Armfield	08/05/20	Updated cash tax model based on feedback received during call with KPMG project team, relating to certain tax rules.	3.6	\$ 534	\$ 1,922.40
Lukas van der Veen	08/06/20	Finalized and sent email to I. Hirsch (KPMG US) on potential cash tax consequences related to the disposition of Dutch Purdue companies.	0.1	\$ 565	\$ 56.50
Aroen Rambhadjan	08/06/20	Performed Partner review of draft e-mail on potential cash tax consequences related to the disposition of Dutch Purdue companies drafted by L. van der Veen (KPMG Netherlands).	0.2	\$ 884	\$ 176.80
Frankie Angeleri	08/06/20	Meeting with M. Minnear (KPMG), K. Taylor (KPMG) and F. Angeleri (KPMG) to discuss the findings from the transfer pricing Profit & Loss model.	0.5	\$ 520	\$ 260.00

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#### **EXHIBIT C1**

### Purdue Pharma L.P. Case No. 19-23649

Name	Date	Description	Hours	Rate	Amount
Kieran Taylor	08/06/20	Meeting with M. Minnear (KPMG), K. Taylor (KPMG) and F. Angeleri (KPMG) to discuss the findings from the transfer pricing Profit & Loss model.	0.5	\$ 744	\$ 372.00
Molly Minnear	08/06/20	Meeting with M. Minnear (KPMG), K. Taylor (KPMG) and F. Angeleri (KPMG) to discuss the findings from the transfer pricing Profit & Loss model.	0.5	\$ 868	\$ 434.00
Isaac Hirsch	08/06/20	Performed international tax Managing Director review of calculation of potential tax consequences for purposes of providing cash tax model comments	1.1	\$ 819	\$ 900.90
Ashley Armfield	08/06/20	1.1 Meeting between A. Armfield, J. Commisso, and D. Rowles (all KPMG) to discuss the presentation of the client deliverable as a result of the updated cash tax model.	1.1	\$ 534	\$ 587.40
Devon Rowles	08/06/20	1.1 Meeting between A. Armfield, J. Commisso, and D. Rowles (all KPMG) to discuss the presentation of the client deliverable as a result of the updated cash tax model.	1.1	\$ 350	\$ 385.00
Jess Commisso	08/06/20	1.1 Meeting between A. Armfield, J. Commisso, and D. Rowles (all KPMG) to discuss the presentation of the client deliverable as a result of the updated cash tax model.	1.1	\$ 350	\$ 385.00
Howard Steinberg	08/06/20	Partner review of client deliverables for updated cash tax model regarding tax analysis of Mundipharma disposition.	1.4	\$ 856	\$ 1,198.40
Frankie Angeleri	08/06/20	1.5 Updates to transfer pricing model based on discussion with M. Minnear (KPMG) and K. Taylor (KPMG).	1.5	\$ 520	\$ 780.00
Isaac Hirsch	08/06/20	(1.8) Performed international tax Managing Director review of updates to cash tax model, as of $8/6/2020$ , to account for certain tax rules.	1.8	\$ 819	\$ 1,474.20
Ashley Armfield	08/06/20	$2.1\ Reviewing$ and concurrently updating the cash tax model relating to updates for certain tax rules.	2.1	\$ 534	\$ 1,121.40
Jess Commisso	08/06/20	2.2 Updates to the cash tax model along with related PowerBI visualizations - pursuant to client deliverable preparation.	2.2	\$ 350	\$ 770.00
Ashley Armfield	08/06/20	2.8 Preparing draft deliverable using power BI software in order to illustrate the impact of the updated cash tax model for certain tax rules.	2.8	\$ 534	\$ 1,495.20
Frankie Angeleri	08/06/20	3.3 Updated the transfer pricing model to include KPMG assumptions.	3.3	\$ 520	\$ 1,716.00
Bela Unell	08/07/20	Performed WNT Director review of tax memorandum prepared by KPMG to further analyze with respect to certain potential tax deductions.	0.8	\$ 744	\$ 595.20
Kieran Taylor	08/07/20	Performed Senior Manager review of the transfer pricing summary schedule, prepared by KPMG M&A team, to further transfer pricing analysis.	1.8	\$ 744	\$ 1,339.20
Becky Holtje	08/08/20	1.0 Performed research, as of $8/08/2020$ , to facilitate cash tax modeling regarding timing of certain deductions.	1.0	\$ 744	\$ 744.00

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#### **EXHIBIT C1**

### Purdue Pharma L.P. Case No. 19-23649

Name	Date	Description	Hours	Rate	Amount
Jim Tod	08/10/20	Performed WNT review of restructuring deck and concurrently drafted review comments	1.0	\$ 906	\$ 906.00
Anthony Minervini	08/10/20	Continue, from 8/3, to perform WNT Managing Director review and concurrently draft comments on step plan.	1.0	\$ 893	\$ 893.00
Becky Holtje	08/10/20	1.4 Continued (same day) to perform research to facilitate cash tax modeling regarding timing of certain deductions.	1.4	\$ 744	\$ 1,041.60
Tracy Stone	08/10/20	1.6 Performed legal research related to tax treatment of repayment of trust distributions.	1.6	\$ 906	\$ 1,449.60
Pete DiMatteo	08/10/20	2.3 Performed international tax manager review and concurrently revised the tax cost model examples evaluating potential US tax elections.	2.3	\$ 650	\$ 1,495.00
Becky Holtje	08/10/20	3.9 Performed research, as of $8/10/2020$ , to facilitate cash tax modeling regarding timing of certain deductions.	3.9	\$ 744	\$ 2,901.60
Bela Unell	08/11/20	(0.7) Performed WNT Director level review of technical summaries provided by R Holtje (KPMG) related to certain tax rules and (0.3) draft response with additional areas to research	1.0	\$ 744	\$ 744.00
Pete DiMatteo	08/11/20	1.1 Performed international tax manger review of slide deck depicting potential Dutch (0.5) and Canadian (0.6) transactions and concurrently drafted review comments (for each).	1.1	\$ 650	\$ 715.00
Becky Holtje	08/11/20	1.1 Performed research, as of $8/11/2020, to$ facilitate cash tax modeling regarding timing of certain deductions.	1.1	\$ 744	\$ 818.40
Tracy Stone	08/11/20	0.5 Review of email from R. Holtje (KPMG) regarding fraudulent conveyance analysis; 0.5 Performed legal research related to tax certain tax issues, 0.5 drafted response to same.	1.5	\$ 906	\$ 1,359.00
Douglas Holland	08/12/20	0.5 Performed Principal WNT / International tax review of additional tax planning structure deck and concurrently drafted review comments.	0.5	\$ 985	\$ 492.50
Frankie Angeleri	08/12/20	0.8 Updating transfer pricing profit & loss financial model.	0.8	\$ 520	\$ 416.00
Isaac Hirsch	08/12/20	(0.8) Perform international tax Managing Director review of analysis of potential effect of shareholder elections for purposes of cash tax modeling;	0.8	\$ 819	\$ 655.20
Isaac Hirsch	08/12/20	(0.9) Performed international tax Managing Director review of updates to Dutch planning deck, as of 8/12/2020.	0.9	\$ 819	\$ 737.10
Pete DiMatteo	08/12/20	1.4 Additional analyses, as of $8/12/2020$ , regarding potential US tax elections.	1.4	\$ 650	\$ 910.00
Isaac Hirsch	08/12/20	(2.9) Perform international tax Managing Director review of updates to cash tax model, as of $8/12/2020$ , to account for addition of certain tax regulations.	2.9	\$ 819	\$ 2,375.10

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#### **EXHIBIT C1**

### Purdue Pharma L.P. Case No. 19-23649

Name	Date	Description	Hours	Rate		Amount
Kieran Taylor Tracy Stone		Performed Senior manager review of transfer pricing matrix.  0.2 Review email communication from B. Unell and R. Holtje (both	2.9 3.0	\$ 744 \$ 906	\$ \$	2,157.60 2,718.00
Tracy Stolle	08/12/20	KPMG WNT) related to Purdue trust analysis; 0.3 Drafted detailed email to C. Wilson (KPMG) regarding certain tax considerations; 2.5 Performed legal research related to law regarding tax considerations.	3.0	\$ 900	Ą	2,718.00
Frankie Angeleri	08/12/20	3.5 Begin to create a PowerPoint deliverable based on transfer pricing profit and loss model results.	3.5	\$ 520	\$	1,820.00
Ashley Armfield	08/13/20	0.2 J. Tod (US National Tax expert on Passthroughs), B. Unell (US National expert on Restructuring), T. Stone (US National Tax expert on Trusts), R. Keller (US National Tax expert on Passthroughs), R. Holtje (US National Tax - Restructuring Specialist), I. Hirsch (International Tax), P. DiMatteo (International Tax), A. Armfield (M&A Tax) and J. Commisso (M&A Tax) (all KPMG) met for discussion regarding research and standpoint on partnership and trust implications to historical and future Purdue transactions	0.2	\$ 534	\$	106.80
Becky Holtje	08/13/20	0.2 J. Tod (US National Tax expert on Passthroughs), B. Unell (US National expert on Restructuring), T. Stone (US National Tax expert on Trusts), R. Keller (US National Tax expert on Passthroughs), R. Holtje (US National Tax - Restructuring Specialist), I. Hirsch (International Tax), P. DiMatteo (International Tax), A. Armfield (M&A Tax) and J. Commisso (M&A Tax) (all KPMG) met for discussion regarding research and standpoint on partnership and trust implications to historical and future Purdue transactions	0.2	\$ 744	\$	148.80
Bela Unell	08/13/20	0.2 J. Tod (US National Tax expert on Passthroughs), B. Unell (US National expert on Restructuring), T. Stone (US National Tax expert on Trusts), R. Keller (US National Tax expert on Passthroughs), R. Holtje (US National Tax - Restructuring Specialist), I. Hirsch (International Tax), P. DiMatteo (International Tax), A. Armfield (M&A Tax) and J. Commisso (M&A Tax) (all KPMG) met for discussion regarding research and standpoint on partnership and trust implications to historical and future Purdue transactions.	0.2	\$ 744	\$	148.80
Isaac Hirsch	08/13/20	0.2 J. Tod (US National Tax expert on Passthroughs), B. Unell (US National expert on Restructuring), T. Stone (US National Tax expert on Trusts), R. Keller (US National Tax expert on Passthroughs), R. Holtje (US National Tax - Restructuring Specialist), I. Hirsch (International Tax), P. DiMatteo (International Tax), A. Armfield (M&A Tax) and J. Commisso (M&A Tax) (all KPMG) met for discussion regarding research and standpoint on partnership and trust implications to historical and future Purdue transactions.	0.2	\$ 819	\$	163.80

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#### **EXHIBIT C1**

### Purdue Pharma L.P. Case No. 19-23649

Name	Date	Description	Hours	Rate	Amount
Jess Commisso	08/13/20	0.2 J. Tod (US National Tax expert on Passthroughs), B. Unell (US National expert on Restructuring), T. Stone (US National Tax expert on Trusts), R. Keller (US National Tax expert on Passthroughs), R. Holtje (US National Tax - Restructuring Specialist), I. Hirsch (International Tax), P. DiMatteo (International Tax), A. Armfield (M&A Tax) and J. Commisso (M&A Tax) (all KPMG) met for discussion regarding research and standpoint on partnership and trust implications to historical and future Purdue transactions.	0.2	\$ 350	\$ 70.00
Jim Tod	08/13/20	0.2 J. Tod (US National Tax expert on Passthroughs), B. Unell (US National expert on Restructuring), T. Stone (US National Tax expert on Trusts), R. Keller (US National Tax expert on Passthroughs), R. Holtje (US National Tax - Restructuring Specialist), I. Hirsch (International Tax), P. DiMatteo (International Tax), A. Armfield (M&A Tax) and J. Commisso (M&A Tax) (all KPMG) met for discussion regarding research and standpoint on partnership and trust implications to historical and future Purdue transactions.	0.2	\$ 906	\$ 181.20
Pete DiMatteo	08/13/20	0.2 J. Tod (US National Tax expert on Passthroughs), B. Unell (US National expert on Restructuring), T. Stone (US National Tax expert on Trusts), R. Keller (US National Tax expert on Passthroughs), R. Holtje (US National Tax - Restructuring Specialist), I. Hirsch (International Tax), P. DiMatteo (International Tax), A. Armfield (M&A Tax) and J. Commisso (M&A Tax) (all KPMG) met for discussion regarding research and standpoint on partnership and trust implications to historical and future Purdue transactions.	0.2	\$ 650	\$ 130.00
Rob Keller	08/13/20	0.2 J. Tod (US National Tax expert on Passthroughs), B. Unell (US National expert on Restructuring), T. Stone (US National Tax expert on Trusts), R. Keller (US National Tax expert on Passthroughs), R. Holtje (US National Tax - Restructuring Specialist), I. Hirsch (International Tax), P. DiMatteo (International Tax), A. Armfield (M&A Tax) and J. Commisso (M&A Tax) (all KPMG) met for discussion regarding research and standpoint on partnership and trust implications to historical and future Purdue transactions.	0.2	\$ 893	\$ 178.60
Tracy Stone	08/13/20	0.2 J. Tod (US National Tax expert on Passthroughs), B. Unell (US National expert on Restructuring), T. Stone (US National Tax expert on Trusts), R. Keller (US National Tax expert on Passthroughs), R. Holtje (US National Tax - Restructuring Specialist), I. Hirsch (International Tax), P. DiMatteo (International Tax), A. Armfield (M&A Tax) and J. Commisso (M&A Tax) (all KPMG) met for discussion regarding research and standpoint on partnership and trust implications to historical and future Purdue transactions.	0.2	\$ 906	\$ 181.20

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#### **EXHIBIT C1**

### Purdue Pharma L.P. Case No. 19-23649

Name	Date	Description	Hours	Rate	Amount
Kieran Taylor	08/13/20	Meeting with M. Minnear (KPMG), A. Minervini, K. Taylor - partial attendance (KPMG) and F. Angeleri (KPMG) to discuss the progress and next steps related to draft transfer pricing PowerPoint deliverable as of 8/13/2020.	0.2	\$ 744	\$ 148.80
Anthony Minervini	08/13/20	Meeting with M. Minnear (KPMG), A. Minervini, K. Taylor - partial attendance (KPMG) and F. Angeleri (KPMG) to discuss the progress and next steps related to draft transfer pricing PowerPoint deliverable as of 8/13/2020.	0.3	\$ 893	\$ 267.90
Frankie Angeleri	08/13/20	Meeting with M. Minnear (KPMG), A. Minervini, K. Taylor - partial attendance (KPMG) and F. Angeleri (KPMG) to discuss the progress and next steps related to draft transfer pricing PowerPoint deliverable as of 8/13/2020.	0.3	\$ 520	\$ 156.00
Molly Minnear	08/13/20	Meeting with M. Minnear (KPMG), A. Minervini, K. Taylor - partial attendance (KPMG) and F. Angeleri (KPMG) to discuss the progress and next steps related to draft transfer pricing PowerPoint deliverable as of 8/13/2020.	0.3	\$ 868	\$ 260.40
Tracy Stone	08/13/20	Meeting with M. Minnear (KPMG), A. Minervini, K. Taylor - partial attendance (KPMG) and F. Angeleri (KPMG) to discuss the progress and next steps related to draft transfer pricing PowerPoint deliverable as of 8/13/2020.	0.3	\$ 906	\$ 271.80
Douglas Holland	08/13/20	(0.5) D. Holland (US National Tax expert on International Tax), I. Hirsch (International Tax), and P. DiMatteo (International Tax) (all KPMG) met to discuss research and potential consequences of US tax elections related to contemplated transactions.	0.5	\$ 985	\$ 492.50
Isaac Hirsch	08/13/20	(0.5) D. Holland (US National Tax expert on International Tax), I. Hirsch (International Tax), and P. DiMatteo (International Tax) (all KPMG) met to discuss research and potential consequences of US tax elections related to contemplated transactions.	0.5	\$ 819	\$ 409.50
Pete DiMatteo	08/13/20	(0.5) D. Holland (US National Tax expert on International Tax), I. Hirsch (International Tax), and P. DiMatteo (International Tax) (all KPMG) met to discuss research and potential consequences of US tax elections related to contemplated transactions.	0.5	\$ 650	\$ 325.00
Isaac Hirsch	08/13/20	(0.5) Performed Managing Director level analysis of potential effects of various transfer pricing changes on Purdue cash tax modeling	0.5	\$ 819	\$ 409.50
Frankie Angeleri	08/13/20	Revised the transfer pricing power point deliverable (before meeting with KPMG project team) per instructions by K. Taylor (KPMG).	0.5	\$ 520	\$ 260.00
Tracy Stone	08/13/20	0.7 Communication via email with C. Wilson (KPMG) regarding transferee research.	0.7	\$ 906	\$ 634.20
Devon Rowles	08/13/20	0.8 Revised the Purdue cash tax model with regards to KPMG managing director (I. Hirsh) review comments received.	0.8	\$ 350	\$ 280.00

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#### **EXHIBIT C1**

### Purdue Pharma L.P. Case No. 19-23649

Name	Date	Description	Hours	Rate	Amount
Jess Commisso	08/13/20	0.9 Updates to the Purdue cash tax model and related PowerBI visualization, per review comments received from KPMG managing director (I. Hirsch) as of 8/13/2020.	0.9	\$ 350	\$ 315.00
Pete DiMatteo	08/13/20	1.4 Performed international tax manager review of modeling examples for potential US tax elections associated with proposed transactions	1.4	\$ 650	\$ 910.00
Frankie Angeleri	08/13/20	2.3 Updated transfer pricing PowerPoint slides based on discussion with M. Minnear (KPMG) and K. Taylor (KPMG)	2.3	\$ 520	\$ 1,196.00
Isaac Hirsch	08/13/20	(2.6) Performed international tax Managing Director review of updates to cash tax model, as of 8/13/3030, to determine potential global tax consequences of proposed Dutch and Canadian planning	2.6	\$ 819	\$ 2,129.40
Ashley Armfield	08/13/20	3.1 Preparing detailed analysis of the cash tax model impact resulting from proposed tax planning in Canada and the Netherlands.	3.1	\$ 534	\$ 1,655.40
Jess Commisso	08/13/20	3.9 Updates, as of 8/13/2020, to the Purdue cash tax model and related PowerBI visualization, with regards to review comments received from I. Hirsch (KPMG).	3.9	\$ 350	\$ 1,365.00
Ashley Armfield	08/14/20	0.6 Drafting email to I. Hirsch (KPMG) relating to the proposed deliverable, including potential open items and highlighting tax benefits relating to the certain international tax issues for US tax	0.6	\$ 534	\$ 320.40
Ashley Armfield	08/14/20	1.6 Reviewing Dutch and Canada proposed tax planning information in cash tax model based on comments from Managing Director I. Hirsch (KPMG)	1.6	\$ 534	\$ 854.40
Ashley Armfield	08/14/20	1.8 Senior Associate review of information relating to cash tax modeling outputs of inclusion into certain tax rules into model, provided by J. Commisso (KPMG), and concurrently drafted comments.	1.8	\$ 534	\$ 961.20
Jess Commisso	08/14/20	2.1 Additional updates to the Purdue cash tax model and related PowerBI visualization, with regards to review comments received from I. Hirsch (KPMG).	2.1	\$ 350	\$ 735.00
Pete DiMatteo	08/14/20	3.2 Perform international tax manager analysis regarding potential US tax elections including their impact on the global cash tax model	3.2	\$ 650	\$ 2,080.00
Frankie Angeleri	08/14/20	3.2 Updated the transfer pricing PowerPoint deliverable based on information for additional entities.	3.2	\$ 520	\$ 1,664.00
Isaac Hirsch	08/14/20	(3.3) Performed International Tax Managing Director review of updates to cash tax model to determine potential global tax consequences of proposed Dutch and Canadian planning	3.3	\$ 819	\$ 2,702.70
Curt Wilson	08/16/20	Performed legal research related to certain distribution and transfer issues (1.2). Draft email to T. Stone (KPMG) regarding results of research and preliminary conclusions (0.3).	1.5	\$ 744	\$ 1,116.00

# **19-23649**-std **Doc 1974** Filed 10/02/20 **Entered 10/02/20 19:50:33 Main Document** Pgg114off1228

#### **EXHIBIT C1**

### Purdue Pharma L.P. Case No. 19-23649

Name	Date	Description	Hours	Rate	Amount
Bela Unell	08/17/20	Performed WNT Director level review of technical correspondence, initially drafted by I. Hirsch (KPMG), regarding Canadian and Dutch restructuring recommendation	0.2	\$ 744	\$ 148.80
Tracy Stone	08/17/20	0.5 Email communication with C. Wilson and L. Mack (both KPMG) regarding certain issues in connection with distributions and transfers.	0.5	\$ 906	\$ 453.00
Isaac Hirsch	08/17/20	(1.4) Performed international Tax Managing Director review of updates to Purdue cash tax model, as of $8/17/2020$ , for certain tax rules.	1.4	\$ 819	\$ 1,146.60
Isaac Hirsch	08/17/20	(1.5) Perform managing director review of updates to Purdue cash tax model for effect certain tax rules.	1.5	\$ 819	\$ 1,228.50
Howard Steinberg	08/17/20	Partner review of client deliverables for updated cash tax model regarding tax analysis of Mundipharma disposition and concurrently drafted review comments.	1.5	\$ 856	\$ 1,284.00
Ashley Armfield	08/18/20	0.4 Prepared summary of updated cash tax model results for KPMG management review.	0.4	\$ 534	\$ 213.60
Howard Steinberg	08/18/20	Performed Partner review of updated client deliverables for updated cash tax model regarding tax analysis of Mundipharma disposition.	1.0	\$ 856	\$ 856.00
Devon Rowles	08/18/20	Updates to the cash tax model with regards to KPMG senior associate's review comments (A. Armfield) received.	1.3	\$ 350	\$ 455.00
Ashley Armfield	08/18/20	3.7 Updated cash tax model to incorporate scenarios related to Canadian and Dutch tax planning.	3.7	\$ 534	\$ 1,975.80
Ashley Armfield	08/18/20	3.9 Updated cash tax model to reflect a new base case scenarios to include international tax considerations.	3.9	\$ 534	\$ 2,082.60
Becky Holtje	08/19/20	0.5 Performed research, as of 8/19/2020, to facilitate cash tax modeling regarding timing of certain deductions.	0.5	\$ 744	\$ 372.00
Douglas Holland	08/19/20	0.5 Performed WNT-International tax research on issues pursuant to cash tax modeling determinations.	0.5	\$ 985	\$ 492.50
Isaac Hirsch	08/19/20	(0.7) Performed International Tax Managing Director review of updates to assumptions in the Purdue cash tax model as of 8/19/2020.	0.7	\$ 819	\$ 573.30
Pete DiMatteo	08/19/20	1.1 Performed International tax manager analysis regarding potential application of tax treaty benefits.	1.1	\$ 650	\$ 715.00
Isaac Hirsch	08/19/20	(1.6) Performed international tax managing director review of updates to cash tax model for Dutch and Canadian tax impact relating to external request from Province	1.6	\$ 819	\$ 1,310.40
Frankie Angeleri	08/20/20	0.9 Revised the transfer pricing PowerPoint deliverable with regards to review comments received from K. Taylor (KPMG).	0.9	\$ 520	\$ 468.00
Devon Rowles	08/20/20	0.9 Updates to the Purdue cash tax model with regards to senior associate review comments (A. Armfield) received.	0.9	\$ 350	\$ 315.00

# **19-23649**-8td **Doc 1974** Filed 10/02/20 **Entered 10/02/20 19:50:39 Main Document** Pgg425off1228

#### **EXHIBIT C1**

### Purdue Pharma L.P. Case No. 19-23649

Name	Date	Description	Hours Rate		Amount	
Ashley Armfield	08/20/20	1.2 Senior Associate review of cash tax model updates made by J. Commisso (KPMG) relating to sensitivity analysis.	1.2	\$ 534	\$ 640.80	
Curt Wilson	08/20/20	Perform legal research and concurrently drafting findings to T. Stone (KPMG WNT).	1.5	\$ 744	\$ 1,116.00	
Isaac Hirsch	08/20/20	(1.9) Performed International Tax Managing Director review of updates to cash tax model for Dutch and Canadian tax impact relating to external request from Province	1.9	\$ 819	\$ 1,556.10	
Ashley Armfield	08/20/20	1.9 Meeting with A. Armfield and D. Rowles (both KPMG) to discuss updates to sensitivity analysis for client deliverable.	1.9	\$ 534	\$ 1,014.60	
Devon Rowles	08/20/20	1.9 Meeting with A. Armfield and D. Rowles (both KPMG) to discuss updates to sensitivity analysis for client deliverable.	1.9	\$ 350	\$ 665.00	
Jess Commisso	08/20/20	2.1 Continued, from earlier in the day, to update client deliverable file per review comments received from I. Hirsh (KPMG Managing Director).	2.1	\$ 350	\$ 735.00	
Casey Nunez	08/20/20	(2.3) Performed M&A Tax Senior Manager review of updated cash tax modeling sensitivity analysis as requested by Province.	2.3	\$ 744	\$ 1,711.20	
Ashley Armfield	08/20/20	2.4 Updating power Bi sensitivity analysis deliverable.	2.4	\$ 534	\$ 1,281.60	
Jess Commisso	08/20/20	3.9 Began to update client deliverable file per review comments received from I. Hirsh (KPMG Managing Director).	3.9	\$ 350	\$ 1,365.00	
Ashley Armfield	08/21/20	0.8 Additional updates to deliverable PDF based on later comments from I. Hirsch (KPMG) relating to inquiry received from Province (Canadian and Dutch tax planning impact).	0.8	\$ 534	\$ 427.20	
Ashley Armfield	08/21/20	0.8 I. Hirsch and A. Armfield (both KPMG) meeting to discuss updates that need to be performed to estimated cash tax model for Dutch and Canadian tax impact relating to external request from Province.	0.8	\$ 534	\$ 427.20	
Isaac Hirsch	08/21/20	0.8 I. Hirsch and A. Armfield (both KPMG) meeting to discuss updates that need to be performed to estimated cash tax model for Dutch and Canadian tax impact relating to external request from Province.	0.8	\$ 819	\$ 655.20	
Howard Steinberg	08/21/20	Partner review of client deliverables for updated cash tax model regarding tax analysis of Dutch and Canadian tax planning.	1.0	\$ 856	\$ 856.00	
Isaac Hirsch	08/21/20	(1.4) Perform International Tax Managing Director review of updates to Purdue cash tax model.	1.4	\$ 819	\$ 1,146.60	
Isaac Hirsch	08/21/20	(1.8) Perform international tax Managing Director review of updates to Purdue cash tax model for Dutch and Canadian tax impact relating to external request from Province	1.8	\$ 819	\$ 1,474.20	
Ashley Armfield	08/21/20	3.9 Updating sensitivity analysis based on comments received from I. Hirsch (KPMG) during call related to Province request.	3.9	\$ 534	\$ 2,082.60	

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#### **EXHIBIT C1**

### Purdue Pharma L.P. Case No. 19-23649

Name	Date	Description	Hours	Rate	Amount
Douglas Holland	08/22/20	Performed Washington National International tax review of presentation of cash tax benefit for Dutch and Canadian proposals 0.6; as well as cover email (related to same) to the debtors advisors (0.4)	1.0	\$ 985	\$ 985.00
Isaac Hirsch	08/22/20	Performed managing director review of updates to cash tax modeling sensitivity analysis prepared in response to request by M. Atkinson of Province.	2.8	\$ 819	\$ 2,293.20
Frankie Angeleri	08/24/20	0.7 Continued, same day, to update the transfer pricing power point deliverable with regards to K. Taylor's (KPMG) comments.	0.7	\$ 520	\$ 364.00
Howard Steinberg	08/24/20	Perform Partner review of client deliverables, as of 8/24/20, for updated cash tax model with regards to tax analysis prepared in response to request by M. Atkinson of Province.	0.8	\$ 856	\$ 684.80
Tracy Stone	08/24/20	1.4 Performed legal research regarding law regarding certain trust / beneficiary rules.	1.4	\$ 906	\$ 1,268.40
Isaac Hirsch	08/24/20	(1.7) Prepare response to T. Matlock of Davis Polk regarding confirmation of information request list outstanding items	1.7	\$ 819	\$ 1,392.30
Frankie Angeleri	08/24/20	3.9 Updated transfer pricing power point deliverable with regards to K. Taylor's (KPMG) comments.	3.9	\$ 520	\$ 2,028.00
Frankie Angeleri	08/25/20	Finalized the Purdue transfer pricing PowerPoint deliverable in preparation for KPMG management review.	3.1	\$ 520	\$ 1,612.00
Frankie Angeleri	08/26/20	1.1 Performed review of information stated in the transfer pricing PowerPoint deliverable; 0.2 drafted email to M. Minnear (KPMG) with transfer pricing deliverable for review.	1.3	\$ 520	\$ 676.00
Kieran Taylor	08/26/20	Senior Manager review and concurrently revise KPMG draft deliverable summarizing transfer pricing analysis.	2.7	\$ 744	\$ 2,008.80
Frankie Angeleri	08/26/20	2.9 Updates to the transfer pricing deliverable to address Manager review comments received.	2.9	\$ 520	\$ 1,508.00
Jess Commisso	08/27/20	0.6 Review of newly received documentation provided by client to determine relevance to engagement and share with broader KPMG team.	0.6	\$ 350	\$ 210.00
Ashley Armfield	08/27/20	2.1 Updating cash tax model deliverable to reflect change in assumptions and impact of certain tax rules.	2.1	\$ 534	\$ 1,121.40
Kieran Taylor	08/27/20	Continued (from previous day) to perform Senior Manager review and concurrently revise KPMG draft deliverable summarizing transfer pricing analysis.	2.4	\$ 744	\$ 1,785.60
Pete DiMatteo	08/31/20	0.7 Performed international tax manager analysis regarding potential U.S. tax consequences of various tax elections.	0.7	\$ 650	\$ 455.00
Howard Steinberg	08/31/20	Partner review of client deliverables for updated cash tax model regarding impact of certain tax rules.	1.0	\$ 856	\$ 856.00
Casey Nunez	08/31/20	(2.2) Performed M&A Tax Senior Manager Review of cash tax modeling updates for overall foreign loss attributes of Purdue owners	2.2	\$ 744	\$ 1,636.80

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#### **EXHIBIT C1**

### Purdue Pharma L.P. Case No. 19-23649

Name	Date	Description	Hours	Rate	Amount
Isaac Hirsch	08/31/20	Perform Managing director review of updates to sensitivity analysis for cash tax modeling.	3.3	\$ 819	\$ 2,702.70
		<b>Total Bankruptcy Tax Consulting Services</b>	251.7		\$ 157,471.50

# **19-23649**-std **Doc 1***972*4 **Filed 1**0/02/20 **Entered 1**0/02/20 **1**9:**5**0:**33 Main Document Pr**g 9133 off 1228

**EXHIBIT C2** 

### Purdue Pharma L.P. Case No. 19-23649

Non -Working Travel Time August 1, 2020 through August 31, 2020

Name	Date	Description	Hours	Rate	Amount
		no fees billed for these services in current month			
		Total Non-Working Travel Time			\$ -

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**EXHIBIT C3** 

Purdue Pharma L.P.
Case No. 19-23649
Retention Services
August 1, 2020 through August 31, 2020

Name	Date	Description	Hours	Rate	Amount
	no	fees billed for these services in current month			
		Total Retention Services	0.0		<u> </u>

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#### **EXHIBIT C4**

### Purdue Pharma L.P. Case No. 19-23649

Fee Application Preparation Services August 1, 2020 through August 31, 2020

Name	Date	Description	Hours	Rate	A	Amount
Wendy Shaffer	08/05/20	0.1 Drafted email to B. Masumoto (US Trustee) to provide copy of KPMG's Purdue 6th monthly fee statement - once filing is confirmed.	0.1	\$ 202	\$	20.20
Wendy Shaffer	08/05/20	0.1 Review email from M. Pera (Davis Polk) regarding changes requested to Purdue Pharma 6th monthly fee statement and forward copy of change to H. Steinberg (KPMG Partner);	0.1	\$ 202	\$	20.20
Wendy Shaffer	08/05/20	0.2 Pulled Updated Work in Progress report to confirm billable hours for Purdue for July	0.2	\$ 202	\$	40.40
Wendy Shaffer	08/05/20	0.3 Prepared Purdue 6th monthly fee statement in Excel to provide to Fee Examiner and 0.1 send via email to M. Plangman (KPMG) for review/approval;	0.4	\$ 202	\$	80.80
Wendy Shaffer	08/05/20	0.3 Revised the Purdue Pharma 6th monthly fee statement per direction from D. Polk and re-PDF and 0.1 send email to provide updated version to M. Pera (Davis Polk)	0.4	\$ 202	\$	80.80
Wendy Shaffer	08/07/20	0.1 Performed initial review of Purdue Fee Examiner report and communication with M. Plangman (KPMG) regarding next steps	0.1	\$ 202	\$	20.20
Wendy Shaffer	08/07/20	1.9 Updated exhibit C1 of Purdue Pharma 7th monthly fee statement to include data received from professionals as of 8/7/2020	1.9	\$ 202	\$	383.80
Wendy Shaffer	08/07/20	1.5 Continued, on same day, to update exhibit C1 of Purdue Pharma 7th monthly fee statement to include data received from professionals as of 8/7/2021	1.5	\$ 202	\$	303.00
Monica Plangman	08/10/20	Performed Associate Director review of Fee Examiner report related to KPMG's 2nd Interim.	0.3	\$ 264	\$	79.20
Wendy Shaffer	08/11/20	0.1 Drafted email to provide copy of Purdue June monthly fee statement to Fee Examiner	0.1	\$ 202	\$	20.20
Wendy Shaffer	08/17/20	1.7 Updates to exhibit C1 of Purdue July monthly fee statement to include data received from professionals as of 8/17.	1.7	\$ 202	\$	343.40
Wendy Shaffer	08/20/20	0.5 Updates to exhibit C1 of Purdue July monthly fee statement to include data received from professionals as of 8/20.	0.5	\$ 202	\$	101.00
Wendy Shaffer	08/23/20	1.2 Finalized Purdue July fee statement in preparation for management review; 0.1 drafted email to send copy of finalized exhibits to M. Land (KPMG) to address previous request/comments from Davis Polk related to KPMG fee statements; 0.1 email to B. Defliese (KPMG) to request review of final draft of Purdue fee statement to confirm hours billed by KPMG foreign member firms	1.4	\$ 202	\$	282.80

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#### **EXHIBIT C4**

### Purdue Pharma L.P. Case No. 19-23649

Fee Application Preparation Services August 1, 2020 through August 31, 2020

Name	Date	Description	Hours	Rate	A	Amount
Wendy Shaffer	08/24/20	0.1 Communication via email regarding outstanding foreign services to be included in Purdue Pharma July monthly fee statement; 0.7 call with M. Plangman (KPMG) regarding go forward to respond to Purdue fee examiner; 1.4 Updates to Purdue Fee Examiner file to prepare response - per direction from M. Plangman (KPMG); 0.4 communication with A. Armfield (KPMG) regarding go forward to address comments from fee examiner related to Purdue Interim; 0.3 finalized Purdue FE file and send to H. Steinberg (KPMG Partner) and S. Carlin (KPMG office of General counsel) for additional discussion;	2.9	\$ 202	\$	585.80
Monica Plangman	08/25/20	Prepare for and attend call with S. Carlin, A Armfield, M. Land and W. Shaffer (all KPMG) regarding Fee Examiner report related to 2nd Interim and next steps.	0.5	\$ 264	\$	132.00
Wendy Shaffer	08/25/20	0.5 Call with M. Plangman and S. Carlin (KPMG OGC) regarding next steps to address fee examiner comments; 0.3 call with D. Klauder (Purdue Fee Examiner) and S. Carlin (KPMG Office of General Counsel) regarding response to Fee Examiner 2nd Interim report; 0.1 Drafted email to D. Klauder (Purdue Fee Examiner) regarding agreed upon reduction amount related to KPMG's 2nd Interim; 1.3 updates to Purdue Pharma monthly fee statement per direction from M. Land (KPMG);	2.2	\$ 202	\$	444.40
Monica Plangman	08/26/20	Associate director review of fee application and concurrently provide comments.	0.7	\$ 264	\$	184.80
Wendy Shaffer	08/27/20	0.2 Updated Purdue Pharma 7th monthly fee statement exhibits per direction from M. Plangman (KPMG); 0.1 drafted email to provide final draft of same to KPMG Partner / team leads to review review/approval;	0.3	\$ 202	\$	60.60
Monica Plangman Wendy Shaffer	08/28/20 08/28/20	Review and final approval of fee application prior to finalization.  0.1 Drafted Purdue Cover Sheet for 7th monthly fee statement and 0.1 drafted email to M. Plangman (KPMG to provide copy of same, along with finalized exhibits for approval; 0.1 Updated Purdue cover sheet for M. Plangman (KPMG) and 0.1 drafted email to H. Steinberg (KPMG) to request review/approval of same;	0.2 0.4	\$ 264 \$ 202	\$ \$	52.80 80.80
Wendy Shaffer	08/31/20	0.4 Continue, same day, to prepare Purdue Pharma 8th (August) monthly fee statement by incorporation data received to date for August	0.4	\$ 202	\$	80.80
Wendy Shaffer	08/31/20	0.1 Reviewed Work in Progress report to confirm billable hours for Purdue Pharma for August; 0.5 Begin to prepare Purdue 3rd Interim fee statement documents; 0.2 PDF Purdue 7th monthly in preparation of filing and send to M. Plangman (KPMG) for final approval; 0.1draft email to D. Consla and M. Pera (David Polk) to request filing and service of same	0.9	\$ 202	\$	181.80
Wendy Shaffer	08/31/20	3.6 Began to prepare Purdue Pharma 8th (August) monthly fee statement by incorporation data received to date for August	3.6	\$ 202	\$	727.20

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#### **EXHIBIT C4**

### Purdue Pharma L.P. Case No. 19-23649

Fee Application Preparation Services August 1, 2020 through August 31, 2020

Name	Date	Description	Hours	Rate	A	mount
Monica Plangman	08/31/20	Approve revised final fee application documents prior to transmission for filing.	0.2	\$ 264	\$	52.80
		<b>Total Fee Application Preparation Services</b>	21.0		\$ 4	,359.80

# **19-23649**-8dd **Doc 1924** Filed **10/02/20 Entered 10/02/20 19:50:33 Main Document** Pgg129 of **22**8

#### **EXHIBIT D**

### Purdue Pharma L.P. Case No. 19-23649

Summary of Out of Pocket Expenses August 1, 2020 through August 31, 2020

Category		Amount		
Airfare	\$	-		
Lodging	\$	-		
Meals	\$	-		
Ground Transportation	\$	-		
Miscellaneous		-		
Total	\$	-		

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#### **EXHIBIT D1**

### Purdue Pharma L.P. Case No. 19-23649

Detail of Out of Pocket Expenses August 1, 2020 through August 31, 2020

Name	Date	Description	Amount
		Air Fare Subtotal	\$ -
		Lodging Subtotal	\$ -
		Meals Subtotal	\$ -
		Total Ground Transportation	\$ -
		Miscellaneous Subtotal	\$ -
		Total Out of Pocket Expenses	\$ -

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### **Schedule 4**

### **19-23649-std Doc 1929 Filed 10/18/20 Entered 10/18/20 16:49:39 Main Document**POP (10/3 of 11/2 8

### UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

	:	
In re:	:	Chapter 11

PURDUE PHARMA L.P., et al., : Case No. 19-23649 (RDD)

Debtors.<sup>1</sup> : (Jointly Administered)

\_\_\_\_\_\_

# NINTH MONTHLY FEE STATEMENT OF KPMG LLP FOR COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED AS TAX CONSULTANT FOR THE DEBTORS AND THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR THE PERIOD FROM SEPTEMBER 1, 2020 THROUGH SEPTEMBER 30, 2020

Name of Applicant:	KPMG LLP					
Authorized to Provide Professional Services to:	The Debtors and the Official Committee of Unsecured Creditors					
Date of Retention:	February 24, 2020, nunc pro tunc to December 23, 2019					
Period for Which Compensation and Reimbursement is Sought:	nd September 1, 2020 thro September 30, 2020					
Amount of Compensation Sought as Actual, Reasonable, and Necessary:	\$	50,683.90				
Less 20% Holdback:	\$	(10,136.78)				
Amount of Expense Reimbursement Sought as Actual, Reasonable, and Necessary:	\$	0.00				
Total Fees and Expenses Due:	\$	40,547.12				

The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

# 19-23649-std Doc 1829 Filed 10/18/20 Entered 10/18/20 16:49:39 Main Document P@g024off1128

Dated: October 18, 2020

/s/ Howard Steinberg

Howard Steinberg Partner, KPMG LLP 1350 Avenue of the Americas New York, New York 10019 (212) 872-6562

# 19-23649-8td Doc 1829 Filed 10/18/20 Entered 10/18/20 16:49:39 Main Document P@ 40560f11628

#### **EXHIBIT A**

### Purdue Pharma L.P. Case No. 19-23649

Summary Of Hours and Discounted Fees Incurred By Professional September 1, 2020 through September 30, 2020

Professional Person	Position & Department	Country of Origin	Total Billed Hours	rly Billing Rate	•	
Ashley Armfield	Senior Associate - M&A Tax	US	10.0	\$ 534	\$	5,340.00
Becky Holtje	Senior Manager - Washington National Tax	US	4.0	\$ 744	\$	2,976.00
Bela Unell	Senior Manager - Washington National Tax	US	1.1	\$ 744	\$	818.40
Casey Nunez	Senior Manager - M&A Tax	US	4.9	\$ 744	\$	3,645.60
Curt Wilson	Senior Manager - Washington National Tax	US	5.1	\$ 744	\$	3,794.40
Douglas Holland	Principal - Washington National Tax	US	3.2	\$ 985	\$	3,152.00
Frankie Angeleri	Associate - Economic & Valuation Services	US	5.7	\$ 520	\$	2,964.00
Howard Steinberg	Partner - M&A Tax	US	2.0	\$ 856	\$	1,712.00
Isaac Hirsch	Managing Director - Int'l Tax	US	14.8	\$ 819	\$	12,121.20
Jess Commisso	Associate - M&A Tax	US	2.7	\$ 350	\$	945.00
Kieran Taylor	Senior Manager - Tax	US	1.0	\$ 744	\$	744.00
Larry Mack	Senior Manager - Washington National Tax	US	1.0	\$ 744	\$	744.00
Molly Minnear	Principal - Economic & Valuation Services	US	3.0	\$ 868	\$	2,604.00
Monica Plangman	Associate Director - Bankruptcy	US	1.0	\$ 264	\$	264.00
Pete DiMatteo	Manager - Int'l Tax	US	9.2	\$ 650	\$	5,980.00
Rob Keller	Managing Director - Washington National Tax	US	0.3	\$ 893	\$	267.90
Tracy Stone	Principal - Washington National Tax	US	1.5	\$ 906	\$	1,359.00
Wendy Shaffer	Manager - Bankruptcy	US	6.2	\$ 202	\$	1,252.40
Subtotal of Hours and Disc	counted Fees		76.7		\$	50,683.90
<b>Total Discounted Fees</b>					\$	50,683.90
Out of Pocket Expenses					\$	
<b>Total Fees and Out of Pock</b>	ket Expenses				\$	50,683.90
Less Holdback Adjustment (20%)				\$	(10,136.78)	
Net Requested Fees & Out of Pocket Expenses				\$	40,547.12	
Blended Hourly Rate				\$ 660.81		

KPMG LLP Monthly Fee Statement Page 1 of 14

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#### **EXHIBIT B**

### Purdue Pharma L.P. Case No. 19-23649

Summary of Hours and Discounted Fees Incurred by Category September 1, 2020 through September 30, 2020

		Total	Total Fee		
Category	Exhibit	Billed Hours	<b>Requested</b>		
Bankruptcy Tax Consulting Services	C1	68.6	\$	48,430.40	
Non -Working Travel Time	C2	0.0	\$	-	
Retention Services	C3	0.0	\$	-	
Fee Application Preparation Services	C4	8.1	\$	2,253.50	
Total		76.7	\$	50,683.90	

KPMG LLP Monthly Fee Statement Page 2 of 14

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#### **EXHIBIT C1**

#### Purdue Pharma L.P. Case No. 19-23649

Bankruptcy Tax Consulting Services September 1, 2020 through September 30, 2020

Name	Date	Description	Hours	Rate	Amount
Douglas Holland	09/01/20	Performed Washington National Tax (WNT - International tax) Principal review, and concurrently draft response to, question from P. DiMatteo (KPMG-Int'l tax manager) regarding certain tax issues for purposes of cash tax modeling.	0.4	\$ 985	\$ 394.00
Jess Commisso	09/01/20	0.6 Review of newly received provided by client documentation to determine relevance to engagement in preparation for distribution to broader KPMG team.	0.6	\$ 350	\$ 210.00
Ashley Armfield	09/01/20	1.1 Updating Purdue cash tax deliverable per review comments from I. Hirsch (KPMG Managing Director) and C. Nunez (KPMG Senior Manager).	1.1	\$ 534	\$ 587.40
Pete DiMatteo	09/01/20	1.8 Performed international tax manager analysis regarding the impact of certain potential U.S. tax elections.	1.8	\$ 650	\$ 1,170.00
Isaac Hirsch	09/01/20	Performed managing director review of analysis of potential tax elections.	2.3	\$ 819	\$ 1,883.70
Kieran Taylor	09/02/20	Meeting with M. Minnear (KPMG), K. Taylor (KPMG) and F. Angeleri (KPMG) to discuss M. Minnear's review of the transfer pricing PowerPoint deliverable.	0.5	\$ 744	\$ 372.00
Frankie Angeleri	09/02/20	Meeting with M. Minnear (KPMG), K. Taylor (KPMG) and F. Angeleri (KPMG) to discuss M. Minnear's review of the transfer Pricing PowerPoint deliverable;	0.5	\$ 520	\$ 260.00
Molly Minnear	09/02/20	Meeting with M. Minnear (KPMG), K. Taylor (KPMG) and F. Angeleri (KPMG) to discuss M. Minnear's review of the transfer Pricing PowerPoint deliverable;	0.5	\$ 868	\$ 434.00
Molly Minnear	09/02/20	(0.7) Performed initial Principal Economic & Valuation services review of PowerPoint deck summary of economic analysis, along with related workpapers, prepared by F. Angeleri and K. Taylor.	0.7	\$ 868	\$ 607.60
Isaac Hirsch	09/02/20	Drafted response to questions from Davis Polk related to preparation of information request list for purposes of advancing cash tax model	0.8	\$ 819	\$ 655.20
Howard Steinberg	09/02/20	Partner review of client deliverables for updated cash tax model regarding tax analysis of Mundipharma disposition.	1.0	\$ 856	\$ 856.00
Pete DiMatteo	09/02/20	1.6 Performed international tax manager modeling of certain U.S. tax elections.	1.6	\$ 650	\$ 1,040.00
Frankie Angeleri	09/03/20	1.0; Addressed review comments from M. Minnear (KPMG) in the transfer pricing PowerPoint deliverable	1.0	\$ 520	\$ 520.00
Pete DiMatteo	09/03/20	1.4 Continued, from prior day, to perform international tax manager modeling of certain U.S. tax elections.	1.4	\$ 650	\$ 910.00
Isaac Hirsch	09/03/20	Perform managing director review of updated cash tax modeling deliverable in preparation to send to KPMG Washington National Tax (WNT) for review of same	2.5	\$ 819	\$ 2,047.50
Larry Mack	09/04/20	Conference call with C. Wilson (KPMG) and L. Mack (KPMG) regarding transferee considerations (.3).	0.3	\$ 744	\$ 223.20

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#### **EXHIBIT C1**

#### Purdue Pharma L.P. Case No. 19-23649

Bankruptcy Tax Consulting Services September 1, 2020 through September 30, 2020

Name	Date	Description	Hours	Rate	Amount
Curt Wilson	09/04/20	Conference call with C. Wilson (KPMG) and L. Mack (KPMG) regarding transferee considerations (.3).	0.3	\$ 744	\$ 223.20
Larry Mack	09/04/20	Performed legal research regarding law related to certain tax considerations involving the Purdue tax structure (.7).	0.7	\$ 744	\$ 520.80
Curt Wilson	09/04/20	Performed WNT analysis (0.6) and draft reply (0.4) to T. Stone (KPMG) regarding legal research regarding the Company's tax structure.	1.0	\$ 744	\$ 744.00
Tracy Stone	09/06/20	Performed Principal WNT analysis to consider impact of certain legal research performed regarding Purdue beneficiaries.	1.0	\$ 906	\$ 906.00
Isaac Hirsch	09/08/20	(1.0) Call with D. Holland (WNT – International tax), I. Hirsch, C. Nunez, P. DiMatteo and A. Armfield (all internal KPMG Core team) to discuss updated calculations and assumptions in the cash tax model for certain international tax considerations.	1.0	\$ 819	\$ 819.00
Casey Nunez	09/08/20	(1.0) Call with D. Holland (WNT – International tax), I. Hirsch, C. Nunez, P. DiMatteo and A. Armfield (all internal KPMG Core team) to discuss updated calculations and assumptions in the cash tax model for certain international tax considerations.	1.0	\$ 744	\$ 744.00
Pete DiMatteo	09/08/20	(1.0) Call with D. Holland (WNT – International tax), I. Hirsch, C. Nunez, P. DiMatteo and A. Armfield (all internal KPMG Core team) to discuss updated calculations and assumptions in the cash tax model for certain international tax considerations.	1.0	\$ 650	\$ 650.00
Ashley Armfield	09/08/20	(1.0) Call with D. Holland (WNT – International tax), I. Hirsch, C. Nunez, P. DiMatteo and A. Armfield (all internal KPMG Core team) to discuss updated calculations and assumptions in the cash tax model for certain international tax considerations.	1.0	\$ 534	\$ 534.00
Douglas Holland	09/08/20	(1.0) Call with D. Holland (WNT – International tax), I. Hirsch, C. Nunez, P. DiMatteo and A. Armfield (all internal KPMG Core team) to discuss updated calculations and assumptions in the cash tax model for certain international tax considerations.	1.0	\$ 985	\$ 985.00
Ashley Armfield	09/08/20	1.3 Updated the Purdue cash tax deliverable based on results of call with KPMG WNT and project team.	1.3	\$ 534	\$ 694.20
Ashley Armfield	09/08/20	0.6 Reviewing updated information request list to send back to Davis Polk surrounding outstanding documentation requests; 1.2 review of bankruptcy docket for information relevant to tax analysis.	1.8	\$ 534	\$ 961.20
Becky Holtje	09/10/20	Consideration related to potential trust implications resulting from legal research.	0.5	\$ 744	\$ 372.00
Bela Unell	09/10/20	Performed WNT research related to potential trust implications resulting from legal research including impact on overall business.	0.6	\$ 744	\$ 446.40

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#### **EXHIBIT C1**

### Purdue Pharma L.P. Case No. 19-23649

Name	Date	Description	Hours	Rate	Amount
Pete DiMatteo	09/10/20	1.0 Continued discussion with D. Holland (WNT – International tax), I. Hirsch, P. DiMatteo and A. Armfield (all internal KPMG Core team) to discuss updated calculations and assumptions in the cash tax model for certain international tax considerations.	1.0	\$ 650	\$ 650.00
Isaac Hirsch	09/10/20	1.0 Continued discussion with D. Holland (WNT – International tax), I. Hirsch, P. DiMatteo and A. Armfield (all internal KPMG Core team) to discuss updated calculations and assumptions in the cash tax model for certain international tax considerations.	1.0	\$ 819	\$ 819.00
Ashley Armfield	09/10/20	1.0 Continued discussion with D. Holland (WNT – International tax), I. Hirsch, P. DiMatteo and A. Armfield (all internal KPMG Core team) to discuss updated calculations and assumptions in the cash tax model for certain international tax considerations.	1.0	\$ 534	\$ 534.00
Douglas Holland	09/10/20	1.0 Continued discussion with D. Holland (WNT – International tax), I. Hirsch, P. DiMatteo and A. Armfield (all internal KPMG Core team) to discuss updated calculations and assumptions in the cash tax model for certain international tax considerations.	1.0	\$ 985	\$ 985.00
Ashley Armfield	09/10/20	1.1 Performed detailed review of international tax calculations to prepare for KPMG project team review meeting relating to cash tax model.	1.1	\$ 534	\$ 587.40
Isaac Hirsch	09/10/20	(1.3) Performed managing director review of updated cash tax modeling sensitivity analysis deliverable to incorporate comments from KPMG Washington National Tax; (0.9) perform managing director review of updated list of assumptions for cash tax model	2.2	\$ 819	\$ 1,801.80
Becky Holtje	09/11/20	Consideration related to potential trust implications resulting from certain tax research.	0.3	\$ 744	\$ 223.20
Molly Minnear	09/11/20	Perform Principal Economic & Valuation services review of updated summary deck of economic analysis prepared by F. Angeleri and K. Taylor (both of KPMG)	0.7	\$ 868	\$ 607.60
Pete DiMatteo	09/11/20	1.1 Performed international tax manager review and concurrently revised assumptions made by KPMG in connection with Global Cash Tax Model	1.1	\$ 650	\$ 715.00
Ashley Armfield	09/11/20	1.2 Revised the Purdue cash tax model assumptions based on recent model updates; 0.2 Reviewing new documentation uploaded to the virtual data room and 0.1 circulate via email to KPMG project team professionals based on relevance.	1.5	\$ 534	\$ 801.00
Ashley Armfield	09/14/20		0.4	\$ 534	\$ 213.60
Pete DiMatteo	09/14/20	0.5 Continued, from 9/11, to perform International tax manager review of assumptions made by KPMG in connection with the Global Cash Tax model	0.5	\$ 650	\$ 325.00
Howard Steinberg	09/14/20	Partner review and concurrently commenting on latest tax research.	1.0	\$ 856	\$ 856.00

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#### **EXHIBIT C1**

#### Purdue Pharma L.P. Case No. 19-23649

Name	Date	Description	Hours	Rate	Amount
Jess Commisso	09/14/20	2.1 Updates to the cash tax model as requested by I. Hirsch (KPMG).	2.1	\$ 350	\$ 735.00
Casey Nunez	09/14/20	(3.1) Performed M&A Tax Senior Manager review of updated cash tax model for additional potential elections	3.1	\$ 744	\$ 2,306.40
Curt Wilson	09/15/20	Conference call with B. Holtje, T. Stone, B. Unell, C. Wilson - partial attendance, and R. Keller (KPMG) regarding certain tax research and the potential application to Purdue trusts.	0.3	\$ 744	\$ 223.20
Rob Keller	09/15/20	Conference call with B. Holtje, T. Stone, B. Unell, C. Wilson - partial attendance, and R. Keller (KPMG) regarding certain tax research and the potential application to Purdue trusts.	0.3	\$ 893	\$ 267.90
Bela Unell	09/15/20	Conference call with B. Holtje, T. Stone, B. Unell, C. Wilson - partial attendance, and R. Keller (KPMG) regarding certain tax research and the potential application to Purdue trusts.	0.5	\$ 744	\$ 372.00
Tracy Stone	09/15/20	Conference call with B. Holtje, T. Stone, B. Unell, C. Wilson - partial attendance, and R. Keller (KPMG) regarding certain tax research and the potential application to Purdue trusts.	0.5	\$ 906	\$ 453.00
Becky Holtje	09/15/20	Conference call with B. Holtje, T. Stone, B. Unell, C. Wilson - partial attendance, and R. Keller (KPMG) regarding certain tax research and the potential application to Purdue trusts.	0.5	\$ 744	\$ 372.00
Curt Wilson	09/15/20	0.6 Performed additional WNT analysis on tax research and potential implications.	0.6	\$ 744	\$ 446.40
Becky Holtje	09/16/20	0.4 Drafting file memo to document various positions taken with respect to tax model	0.4	\$ 744	\$ 297.60
Curt Wilson	09/16/20	Continued additional WNT analysis on tax research and potential implications.	0.6	\$ 744	\$ 446.40
Becky Holtje	09/17/20	0.3 Call with I. Hirsch and B. Holtje (KPMG) to discuss nature of file memo required to document positions in support of positions taken in tax model	0.3	\$ 744	\$ 223.20
Isaac Hirsch	09/17/20	0.3 Call with I. Hirsch and B. Holtje (KPMG) to discuss nature of file memo required to document positions in support of positions taken in tax model	0.3	\$ 819	\$ 245.70
Isaac Hirsch	09/17/20	Performed analysis of deductibility for purposes of cash tax modeling	1.6	\$ 819	\$ 1,310.40
Becky Holtje	09/17/20	2.0 Drafting file memo to document various positions taken with respect to tax model.	2.0	\$ 744	\$ 1,488.00
Molly Minnear	09/22/20	0.2 Meeting with M. Minnear (KPMG), K. Taylor (KPMG) and F. Angeleri (KPMG) to discuss M. Minnear's additional comments on the transfer pricing PowerPoint deliverable and next steps.	0.2	\$ 868	\$ 173.60

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#### **EXHIBIT C1**

#### Purdue Pharma L.P. Case No. 19-23649

Name	Date	Description	Hours	Rate	Amount
Kieran Taylor	09/22/20	0.2 Meeting with M. Minnear (KPMG), K. Taylor (KPMG) and F. Angeleri (KPMG) to discuss M. Minnear's additional comments on the transfer pricing PowerPoint deliverable and next steps.	0.2	\$ 744	\$ 148.80
Frankie Angeleri	09/22/20	0.2 Meeting with M. Minnear (KPMG), K. Taylor (KPMG) and F. Angeleri (KPMG) to discuss M. Minnear's additional comments on the transfer pricing PowerPoint deliverable and next steps.	0.2	\$ 520	\$ 104.00
Casey Nunez	09/22/20	(0.8) Continued discussion with D. Holland (WNT International tax), I. Hirsch, C. Nunez, P. DiMatteo and A. Armfield (all KPMG) to discuss updated calculations and assumptions in the cash tax model for certain international tax considerations.	0.8	\$ 744	\$ 595.20
Douglas Holland	09/22/20	(0.8) Continued discussion with D. Holland (WNT International tax), I. Hirsch, C. Nunez, P. DiMatteo and A. Armfield (all KPMG) to discuss updated calculations and assumptions in the cash tax model for certain international tax considerations.	0.8	\$ 985	\$ 788.00
Ashley Armfield	09/22/20	(0.8) Continued discussion with D. Holland (WNT International tax), I. Hirsch, C. Nunez, P. DiMatteo and A. Armfield (all KPMG) to discuss updated calculations and assumptions in the cash tax model for certain international tax considerations.	0.8	\$ 534	\$ 427.20
Pete DiMatteo	09/22/20	(0.8) Continued discussion with D. Holland (WNT International tax), I. Hirsch, C. Nunez, P. DiMatteo and A. Armfield (all KPMG) to discuss updated calculations and assumptions in the cash tax model for certain international tax considerations.	0.8	\$ 650	\$ 520.00
Isaac Hirsch	09/22/20	(0.8) Continued discussion with D. Holland (WNT International tax), I. Hirsch, C. Nunez, P. DiMatteo and A. Armfield (all KPMG) to discuss updated calculations and assumptions in the cash tax model for certain international tax considerations.	0.8	\$ 819	\$ 655.20
Isaac Hirsch	09/22/20	(0.6) Prepare for call with D. Holland/WNT-International tax to discuss cash tax model by reviewing most current version of Purdue cash tax model	0.6	\$ 819	\$ 491.40
Frankie Angeleri	09/23/20	2.2 Updating transfer pricing slide deck deliverable based on latest partner comments / discussions.	2.2	\$ 520	\$ 1,144.00
Kieran Taylor	09/24/20	Meeting with M. Minnear (KPMG), K. Taylor (KPMG) and F. Angeleri (KPMG) to discuss updates to the transfer pricing PowerPoint deliverable based on M. Minnear's comments.	0.3	\$ 744	\$ 223.20
Molly Minnear	09/24/20	Meeting with M. Minnear (KPMG), K. Taylor (KPMG) and F. Angeleri (KPMG) to discuss updates to the transfer pricing PowerPoint deliverable based on M. Minnear's comments.	0.3	\$ 868	\$ 260.40
Frankie Angeleri	09/24/20	Meeting with M. Minnear (KPMG), K. Taylor (KPMG) and F. Angeleri (KPMG) to discuss updates to the transfer pricing PowerPoint deliverable based on M. Minnear's comments.	0.3	\$ 520	\$ 156.00
Frankie Angeleri	09/24/20	1.5 Updated the Purdue transfer pricing slide deck to include additional tax information based on results of discussion with KPMG project team.	1.5	\$ 520	\$ 780.00

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#### **EXHIBIT C1**

### Purdue Pharma L.P. Case No. 19-23649

Name	Date	Description	Hours	Rate	Amount
Curt Wilson	09/28/20	0.7 Performed WNT Senior Manager analysis regarding the application of certain tax rules.	0.7	\$ 744	\$ 520.80
Isaac Hirsch	09/28/20	Performed analysis of deductibility for purposes of cash tax modeling.	0.8	\$ 819	\$ 655.20
Molly Minnear	09/29/20	Performed Principal Economic & Valuation services review of revised summary presentation and related model, and concurrently provide comments	0.6	\$ 868	\$ 520.80
Curt Wilson	09/29/20	0.6 Perform further WNT analysis regarding the application of certain tax rules/doctrines; 0.6 Began to draft memo regarding conclusions related to same.	1.2	\$ 744	\$ 892.80
Curt Wilson	09/30/20	Finalized draft memo on application of certain tax rules - as began on 9/29.	0.4	\$ 744	\$ 297.60
		<b>Total Bankruptcy Tax Consulting Services</b>	68.6		\$ 48,430.40

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#### **EXHIBIT C2**

### Purdue Pharma L.P. Case No. 19-23649

Non -Working Travel Time September 1, 2020 through September 30, 2020

Name	Date	Description	Hours	Rate	Amount
		no fees billed for these services in current month			
		Total Non-Working Travel Time			<b>\$</b> -

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#### **EXHIBIT C3**

Purdue Pharma L.P.
Case No. 19-23649
Retention Services
September 1, 2020 through September 30, 2020

Name Date		Description	Hours	Rate	Amount
		no fees billed for these services in current month			
		<b>Total Retention Services</b>	0.0		\$ -

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#### **EXHIBIT C4**

#### Purdue Pharma L.P. Case No. 19-23649

Fee Application Preparation Services September 1, 2020 through September 30, 2020

Name	Date	Description	Hours	Rate	A	mount
Wendy Shaffer	09/03/20	0.1 Drafted follow-up email to D. Consla (Davis Polk) regarding status of filing of KPMG's 7th monthly fee statement. 1.0 Updated Purdue 7th monthly fee statement exhibits per direction from Davis Polk. 0.2 finalized same (PDF) and drafted email to send copy of revised fee statement to Davis Polk. 0.1 drafted email to KPMG Partner team lead to provide copy of changes requested.	1.4	\$ 202	\$	282.80
Wendy Shaffer	09/04/20	0.1 Send copy of filed KPMG 7th monthly fee statement to KPMG Partner / team leads along with objection date related to same.	0.1	\$ 202	\$	20.20
Wendy Shaffer	09/08/20	0.3 Prepared Purdue 7th monthly fee statement in Excel to send to Fee Examiner and 0.1 send to M. Plangman (KPMG) for approval and 0.1 drafted email to Purdue fee examiner to provide copy of same	0.5	\$ 202	\$	101.00
Monica Plangman	09/09/20	Review and approve FE report and transmit to W. Shaffer (KPMG)	0.1	\$ 264	\$	26.40
Wendy Shaffer	09/09/20	0.8 Updated exhibit C1 of Purdue 8th monthly fee statement to include data received from professionals as of 9/9/2020; 0.1 drafted email to M. Plangman (KPMG) to provide copy of Purdue 7th monthly fee statement in Excel to send to Fee Examiner and 0.1 drafted email to D. Oliver (Direct fee Review) to provide copy of same for review.	1.0	\$ 202	\$	202.00
Wendy Shaffer	09/11/20	0.3 Updates to exhibit C4 of Purdue 8th monthly fee statement to include data received from professionals as of 9/11/2020	0.3	\$ 202	\$	60.60
Wendy Shaffer	09/14/20	0.6 Updated exhibit C1 of Purdue Pharma August monthly fee statement to include data received from professionals as of 9/14/2020;0.2 Updates to exhibit C1 of Purdue August fee statement to include KPMG foreign member time detail received as of 9/14; 0.2 Finalized Purdue Pharma August fee app in preparation to send to M. Land (KPMG) to make updates related to past comments from Davis Polk; 0.1 email to B. Defliese to request confirmation of foreign time detail hours for Purdue to be included in fee statement; 0.2 Pull updated Work in Progress report for Purdue to confirm final numbers for August.	1.3	\$ 202	\$	262.60
Wendy Shaffer	09/16/20	0.4 Updates to Purdue August monthly fee statement per direction from C. Nunez (KPMG) with regards to previous comments from Davis Polk; 0.1 drafted email to provide copy of same to M. Plangman (KPMG) for review /approval	0.5	\$ 202	\$	101.00
Monica Plangman	09/17/20	Associate director review of monthly fee statement and concurrently provide comments.	0.8	\$ 264	\$	211.20
Wendy Shaffer	09/21/20	0.3 Updates to Purdue 8th monthly fee statement exhibits per M. Plangman (KPMG); 0.1 began to draft cover sheet for PP 8th monthly fee statement;	0.4	\$ 202	\$	80.80
Isaac Hirsch	09/22/20	(0.9) Performed international Managing Director review of Purdue monthly fee statement;	0.9	\$ 819	\$	737.10
Wendy Shaffer	09/23/20	0.1 Drafted email to H. Steinberg (KPMG) to request approval/permission to apply signature to Purdue 8th monthly fee statement.	0.1	\$ 202	\$	20.20

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#### **EXHIBIT C4**

#### Purdue Pharma L.P. Case No. 19-23649

Fee Application Preparation Services September 1, 2020 through September 30, 2020

Name	Date	Description	Hours	Rate	A	Amount
Monica Plangman	09/28/20	Associate director final review of monthly fee statement prior to filing.	0.1	\$ 264	\$	26.40
Wendy Shaffer	09/28/20	0.3 Finalized (PDF) Purdue 8th monthly fee statement and 0.1 send to M. Plangman (KPMG) for approval; 0.1 drafted email to Davis Polk to request filing and services of PP 8th monthly fee statement	0.5	\$ 202	\$	101.00
Wendy Shaffer	09/30/20	0.1 Send follow-up email to Davis Polk to request status of filing of 8th monthly fee statement	0.1	\$ 202	\$	20.20
		Total Fee Application Preparation Services	8.1		\$	2,253.50

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#### **EXHIBIT D**

### Purdue Pharma L.P. Case No. 19-23649

Summary of Out of Pocket Expenses September 1, 2020 through September 30, 2020

Category	Ar	nount
Airfare	\$	-
Lodging	\$	-
Meals	\$	-
Ground Transportation	\$	-
Miscellaneous	\$	
Total	\$	-

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#### **EXHIBIT D1**

### Purdue Pharma L.P. Case No. 19-23649

Detail of Out of Pocket Expenses September 1, 2020 through September 30, 2020

Name	Date	Description	Amount
		Air Fare Subtotal	\$ -
		Lodging Subtotal	
		Meals Subtotal	\$ -
		<b>Total Ground Transportation</b>	\$ -
		Miscellaneous Subtotal	\$ -
		Total Out of Pocket Expenses	\$ -

### **Schedule 5**

### UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

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In re: : Chapter 11

PURDUE PHARMA L.P., et al., : Case No. 19-23649 (RDD)

Debtors.<sup>1</sup> : (Jointly Administered)

Deotors.

# ORDER AUTHORIZING THE EMPLOYMENT AND RETENTION OF KPMG LLP AS TAX CONSULTANT FOR THE DEBTORS AND THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS NUNC PRO TUNC TO DECEMBER 23, 2019

Upon the joint application (the "Joint Application")<sup>2</sup> of the Debtors and the Official Committee of Unsecured Creditors (the "Committee") in the above-captioned chapter 11 cases for entry of an order authorizing the Debtors and the Committee to employ and retain KPMG LLP ("KPMG") as their tax consultant *nunc pro tunc* to December 23, 2019, pursuant to section 328(a) and 1103(a) of title 11 of the United States Code, Rule 2014(a) of the Federal Rules of Bankruptcy Procedure and Rules 2014-1 and 2016-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the Southern District of New York; and upon the Declaration of Howard Steinberg in Support of Application for Order Authorizing Employment and Retention of KPMG LLP as Tax Consultants to the Debtors and the Official Committee of Unsecured Creditors Nunc Pro Tunc to December 23, 2019 (the "Steinberg Declaration"), the Declaration of Brendan Stuhan in Support of Application for Order Authorizing Employment and

<sup>&</sup>lt;sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

<sup>&</sup>lt;sup>2</sup> Capitalized terms not otherwise defined herein shall have the definitions ascribed to them in the Joint Application.

Retention of KPMG LLP as Tax Consultants to the Debtors and the Official Committee of Unsecured Creditors Nunc Pro Tunc to December 23, 2019 (the "UCC Retention Declaration"), and the Declaration of Jon Lowne in Support of Application for Order Authorizing Employment and Retention of KPMG LLP as Tax Consultants to the Debtors and the Official Committee of Unsecured Creditors Nunc Pro Tunc to December 23, 2019 (the "Debtor Retention Declaration," and, collectively with the UCC Retention Declaration, the "Retention Declarations") in support thereof; and the Court being satisfied based on the representations made in the Joint Application and in the Steinberg Declaration that KPMG neither holds nor represents an interest adverse to the Debtors or their estates with respect to the matters upon which they are to be engaged, that they are disinterested as that term is defined under section 101(14) of the Bankruptcy Code, as modified by section 1107(b) of the Bankruptcy Code, and that their employment is necessary and in the best interests of the Committee, the Debtors, and their estates, their creditors, and all parties in interest; and consideration of the Joint Application and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(a)-(b) and 1334(b) and the Amended Standing Order of Reference M-431, dated January 31, 2012 (Preska, C.J.); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Joint Application having been provided, and it appearing that no other or further notice need be provided; and the Court having reviewed the Application and held a hearing to consider the relief requested in the Application on February 21, 2020; and there being no objections to the requested relief; and, after due deliberation and the Court having determined that the legal and factual bases set forth in the Application and at the Hearing establish good and sufficient cause for the relief granted herein, it is hereby ORDERED that:

1. The Joint Application is granted, as set forth herein.

- 2. The Debtors and the Committee are authorized to employ and to retain KPMG as their tax consultant, *nunc pro tunc* to December 23, 2019 in accordance with the terms and conditions set forth in the Joint Application and this Order. In the event of any inconsistency between the Engagement Letter, the Joint Application, and this Order, this Order shall govern.
- 3. KPMG is authorized to provide services to the Debtors and the Committee, including but not limited to the following:
  - a. Tax analysis and proposal of structuring alternatives with respect to any disposition of the assets of the Debtors, their affiliates, and any IACs pursuant to any plan proposed in the Chapter 11 Cases;
  - b. Quantitative analysis, including preparation and/or review of cash tax models, regarding the projection of cash taxes arising from operations, dispositions, reorganization, and repatriation of funds held by the Debtors and IACs;
  - c. Diligence regarding the historical tax positions and tax attributes of the Debtors and the IACs;
  - d. Interacting with tax authorities in order to assess the impact of historical tax matters in regards to any proposed transaction;
  - e. Analysis of the tax implications of any payments made by the Debtors to settle claims;
  - f. Analysis of any proofs of claims from tax authorities;
  - g. Analysis of cancellation of debt ("COD") income as applicable, including the application of Section 108 and relating to the restructuring of any related party debt and the completed capitalization/settlement of intercompany debt; and
  - h. Analysis and proposal of structuring alternatives with respect to the postemergence tax structure of the Debtors and IACs.
- 4. KPMG will file fee applications in accordance with sections 330 and 331 of the Bankruptcy Code, as the case may be, and the applicable Bankruptcy Rules, Local Rules, and any other fee and expense guidelines and orders of this Court and consistent with the proposed compensation set forth in the Joint Application and Engagement Letter; *provided, however*, that the requirements of the Bankruptcy Code, the Bankruptcy Rules, and Local Rule 2016-1 are hereby modified such that KPMG's professionals shall be required only to maintain records of the services rendered for the Debtors and the Committee that include reasonably detailed summary descriptions

of those services, the approximate time expended in providing those services (in 0.1 hour increments) and the identity of the professionals who provided those services. KPMG understands that interim and final fee awards are subject to approval by this Court. KPMG shall use its reasonable efforts to avoid duplication of services provided to any of the Debtors' or the Committee's other retained professionals in these chapter 11 cases. KPMG shall also make a reasonable effort to comply with the U.S. Trustee's requests for information and additional disclosures in connection with the Joint Application and any fee applications filed by KPMG.

- 5. The terms and conditions of the Engagement Letter between KPMG, the Debtors and the Committee, as modified by this Order, are approved.
- 6. To the extent the Debtors, the Committee and KPMG enter into any additional engagement letter(s), the Debtors and the Committee will file such engagement letter(s) with the Bankruptcy Court and serve such engagement letter(s) upon the United States Trustee. If within 10 days of such new engagement letter(s) being served, any parties-in-interest object to the additional services to be provided by KPMG, a hearing before the Court will promptly be scheduled. All additional services will be subject to the provisions of this Order.
- 7. The Engagement Letter's indemnification provisions are hereby modified and restated in their entirety as follows:
  - (a) All requests by KPMG for payment of indemnity pursuant to the Engagement Letter shall be made by means of an application (interim or final as the case may be) and shall be subject to review by the Court to ensure payment of such indemnity conforms to the terms of the Engagement Letter and is reasonable based upon the circumstances of the litigation or settlement in respect of which indemnity is sought; *provided*, *however*, that in no event shall KPMG be indemnified in the case of its own bad-faith, self-dealing, breach of fiduciary duty (if any), gross negligence or willful misconduct;
  - (b) In the event that KPMG seeks reimbursement from the Debtors or the Committee for reasonable attorneys' fees in connection with a request by KPMG for payment of indemnity pursuant to the Engagement Letter, as

modified by this Order, the invoices and supporting time records from such attorneys shall be included in KPMG's own application (both interim and final) and such invoices and time records shall be subject to the Fee Guidelines and the approval of the Court under the standards of sections 330 and 331 of the Bankruptcy Code without regard to whether such attorney has been retained under section 327 of the Bankruptcy Code and without regard to whether such attorneys' services satisfy section 330(a)(3)(C) of the Bankruptcy Code; and

- (c) KPMG shall not be entitled to reimbursement by the Debtors for any fees, disbursements and other charges of KPMG's counsel other than those incurred in connection with a request of KPMG for payment of indemnity.
- 8. Before implementing any increases in KPMG's rates for any individual retained by KPMG and providing services in these cases, KPMG shall file a supplemental affidavit with this Court and provide at least 10 business days' notice to the Debtors, the Committee, and the United States Trustee. The supplemental affidavit shall explain the basis for the requested rate increases in accordance with section 330(a)(3)(F) of the Bankruptcy Code and state whether the Debtors and the Committee have consented to the rate increases. All parties in interest retain all rights to object to any rate increase on all grounds including the reasonableness standard provided for in section 330 of the Bankruptcy Code.
- 9. During the pendency of the Chapter 11 Cases, this Court retains exclusive jurisdiction with respect to any matters, claims, rights or disputes arising out of and/or pertaining to KPMG's engagement and the implementation of this Order until such jurisdiction is relinquished.
- 10. KPMG shall (i) to the extent that KPMG uses the services of independent contractors, subcontractors, or employees of foreign or domestic affiliates or subsidiaries (collectively, the "Contractors") in these cases, KPMG shall pass-through the cost of such Contractors to the Debtors at the same rate that KPMG pays the Contractors, (ii) seek reimbursement for actual costs only, (iii) ensure that the Contractors are subject to the same

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conflict checks as required for KPMG, and (iv) file with the Court such disclosures required by

Bankruptcy Rule 2014.

11. The Debtors and the Committee shall comply with the notice requirement set forth

in paragraph 4(c) of KPMG's Standard Terms and Conditions for Advisory and Tax Services (the

"Standard Terms and Conditions"), including providing the written notice required prior to

disseminating or advancing any of KPMG's advice, recommendations, information, or work

product to third parties.

During the pendency of these Chapter 11 Cases, paragraph 6 of the Standard Terms 12.

and Conditions is deleted.

13. Any Bankruptcy Rule (including but not limited to Bankruptcy Rule 6004(h)) or

Local Rule that might otherwise delay the effectiveness of this Order is hereby waived, for cause,

and the terms and conditions of this Order shall be effective and enforceable immediately upon its

entry.

14. The Debtors, the Committee, and KPMG are authorized to take all such actions as

are necessary and appropriate to implement the terms of this Order.

Dated: February 24, 2020

White Plains, New York

/s/Robert D. Drain

THE HONORABLE ROBERT D. DRAIN

UNITED STATES BANKRUPTCY JUDGE

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#### Schedule 6

UNITED	STATES	BANK	KRUPTC	Y COURT
SOUTHE	ERN DIST	<b>TRICT</b>	OF NEV	V YORK

	:
In re:	: Chapter 11

PURDUE PHARMA L.P., et al., : Case No. 19-23649 (RDD)

Debtors.<sup>1</sup> : (Jointly Administered)

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# CERTIFICATION PURSUANT TO ADMINISTRATIVE ORDER RE: GUIDELINES FOR FEES AND DISBURSEMENTS FOR PROFESSIONALS IN SOUTHERN DISTRICT OF NEW YORK BANKRUPTCY CASES

- I, Howard Steinberg, certify as follows:
- 1. I am a Partner of KPMG LLP ("<u>KPMG</u>"), a professional services firm.
- 2. By Order dated February 24, 2020, KPMG was retained as tax consultant for the above-captioned debtors and debtors in possession (the "Debtors") and the Official Committee of Unsecured Creditors (the "Committee").
- 3. I submit this certification in conjunction with KPMG's Third Joint Interim Fee Application, dated November 11, 2020 (the "<u>Joint Application</u>"), for Interim Allowance of Compensation for Services Rendered and Reimbursement of Expenses for the Period from June 1, 2020 through September 30, 2020 (the "<u>Compensation Period</u>").
- 4. I am the professional designated by KPMG with the responsibility for KPMG's compliance in these cases with the administrative order regarding guidelines for fees and disbursements for professionals in Southern District of New York bankruptcy cases (the "Amended Guidelines").

<sup>&</sup>lt;sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

- 5. I have read KPMG's Joint Application and, to the best of my knowledge, information and belief formed after reasonable inquiry, except as stated herein or in the Joint Application: (i) the fees sought in the Joint Application fall within the Amended Guidelines and the Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses filed under 11 U.S.C. §330 promulgated by the Office of the United States Trustee (61 Fed. Reg. 24890 (May 17, 1996); 28 C.F.R. Part 58, appendix) (the "UST Guidelines" and together with the Amended Guidelines the "Guidelines"); (ii) the fees sought are billed at rates in accordance with those customarily charged by KPMG and generally accepted by KPMG's clients for the types of services rendered to the Debtors and (iii) in providing a reimbursable disbursement, KPMG does not make a profit on the service, whether the service is performed by KPMG in-house or through a third party.
- 6. A copy of the Joint Application is being provided to the United States

  Trustee, any official statutory committees appointed in these cases and the Debtors,

  contemporaneously with the filing hereof.
- 7. To the extent that the Joint Application is not in compliance with the Guidelines, KPMG requests a waiver of any such requirements.

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Dated: November 11, 2020

/s/ Howard Steinberg

Howard Steinberg Partner, KPMG LLP 1350 Avenue of the Americas New York, New York 10019 212 872 6562